

EPA Reg. No. 83923-1

Material Sent for Data Extraction

Reg. # 83923-1

Description: Amend

☒ Material(s) Sent to Data Extraction Contractors:

☒ New Stamped Label Dated 1/15/15

☐ Notification Dated _____

☐ New CSF(s) Dated _____

☐ Other: _____

☐ Decision #: _____

☐ Other Action/Comments: _____

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Jennifer Urbanski

Phone: 347-0156 Division: RD

Date: 1/15/15

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

Ensysyex III, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St., NW
Gig Harbor, WA 98332

Subject: Amended label to add pollinator protection language
Product Name: Bithor SC GC
EPA Reg. No. 83923-1
EPA Decision No. 485457
Submission dated September 27, 2013

JAN 15 2014

Dear Ms. Pruett:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act is acceptable. A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one (1) copy of the final printed labeling before you release the product for shipment with the new labeling. See 40 CFR 156.10(a)(6).

Under 40 CFR 152.130(d), EPA may establish dates by which all product distributed or sold by the registrant must bear revised labeling. The following paragraphs set forth the schedule for ensuring that that your product bears revised labeling within a reasonable time period.

- Any product released for shipment after 2/28/14 must bear the new label.

If these conditions are not complied with, EPA will take appropriate action against this registration. If you have any questions please contact Dr. Jennifer Urbanski at 703-347-0156 or urbanski.jennifer@epa.gov.

Regards,

A handwritten signature in cursive script, appearing to read "Venus Eagle", followed by a horizontal line.

Venus Eagle, Product Manager (01)
Insecticide-Rodenticide Branch
Registration Division (7505P)

RESTRICTED USE PESTICIDE

Toxic to Fish and Aquatic Organisms

For retail sale to and use only by certified applicators or persons under their direct supervision and only for those uses covered by the certified applicator's certification.



BITHOR SC GC

For foliar and systemic control of insect pests of turfgrass, landscape ornamentals, shrubs and trees on golf courses.

Active Ingredient:	By Wt.
Imidacloprid	5.0%
Bifenthrin*	2.0%
Other Ingredients:	93.0%
TOTAL:	100.0%

*Cis isomers 97% minimum, trans isomers 3% maximum

Contains 0.45 pounds of imidacloprid and 0.18 pounds of bifenthrin per gallon

EPA Reg. No. 83923-1 EPA Est. XXXXX-XX-XXX

STOP – Read the label before use

KEEP OUT OF REACH OF CHILDREN

CAUTION

DO NOT USE THIS PRODUCT ON GOLF COURSES IN NASSAU COUNTY OR SUFFOLK COUNTY, NEW YORK

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (866-367-8467) or visit www.for-thor.com.

NET CONTENTS: As marked on container

Manufactured by:

ENSYSTEX IV, Inc.

2175 Village Drive, Fayetteville, NC 28304

FIRST AID

If swallowed	<ul style="list-style-type: none">• Call poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by the poison control center or doctor.• Do not give anything to an unconscious person.
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HOTLINE NUMBER

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-(800)-369-4352 for emergency medical treatment information.

NOTE TO PHYSICIAN

Note To Physician: No specific antidote is available. Treat the patient symptomatically. This product contains a pyrethroid. If large amounts have been ingested, milk, cream and other digestible fats and oils may increase absorption and so should be avoided.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove and wash contaminated clothing before reuse.

Personal Protective Equipment: Applicators and other handlers must wear long-sleeved shirt, long pants, shoes and socks. Follow manufacturer's instructions for cleaning/maintaining PPE. If there are no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations: Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Environmental Hazards

This product is extremely toxic to fish and aquatic invertebrates. Run-off may be hazardous to aquatic organisms in water adjacent to treated areas.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops, plants or weeds. Do not apply this product or allow it to drift to blooming crops, plants or weeds if bees are foraging the treatment area.

This product contains a chemical with properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Rinsing application equipment over the treated area will help avoid run off to water bodies and drainage systems.

ACCEPTED

JAN 15 2014

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under:

EPA. Reg. No: 83923-1

PROTECTION OF POLLINATORS



APPLICATION RESTRICTIONS EXIST FOR THIS PRODUCT BECAUSE OF RISK TO POLLINATORS. FOLLOW APPLICATION RESTRICTIONS FOUND IN THE DIRECTIONS FOR USE TO PROTECT POLLINATORS



Look for the bee hazard icon in the Directions for Use for each application site for specific use restrictions and instructions to protect bees and other insect pollinators.

This product can kill bees and other insect pollinators.

Bees and other insect pollinators will forage on plants when they flower, shed pollen, or produce nectar.

Bees and other insect pollinators can be exposed to this pesticide from:

- Direct contact during foliar applications, or contact with residues on plant surfaces after foliar applications
- Ingestion of residues in nectar and pollen when the pesticide is applied as a seed treatment, soil, tree injection, as well as foliar applications.

When using this Product Take Steps To:

- Minimize exposure of this product to bees and other insect pollinators when they are foraging on pollinator active plants around the application site.
- Minimize drift of this product on to beehives or to off-site pollinator attractive habitat. Drift of this product onto beehives or off-site to pollinator attractive habitat can result in bee kills.

Information on protecting bees and other insect pollinators may be found at the Pesticide Environmental Stewardship website at <http://pesticidestewardship.org/PollinatorProtection/Pages/default.aspx>. Pesticide incidents (for example, bee kills) should immediately be reported to the state / tribal lead agency. For contact information for your state, go to: www.aapco.org/officials.html. Pesticide incidents should also be reported to the National Pesticide Information Center at www.npic.orst.edu or directly to EPA at beekill@epa.gov.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

See individual sites for specific pollinator protection application restrictions. If none exist under the specific site, for outdoor foliar applications, follow these application directions.



Do not apply BITHOR SC GC while bees are foraging. Do not apply BITHOR SC GC to plants that are flowering. Only apply after all flower petals have fallen off.

Restrictions

- Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirement specific to your State or Tribe, consult the agency responsible for pesticide regulation.
- Do not allow people or pets on treated surfaces until the spray has dried.
- Do not water the treated area to the point of run-off
- Do not make applications during rain
- Do not apply this product, by any application method, to linden, basswood or other *Tilia* species in the State of Oregon.
- Application is prohibited directly into sewers or drains, or to any area like a gutter where drainage to sewers, storm drains, water bodies, or aquatic habitat can occur. Do not allow the product to enter any drain during or after application.
- Do not apply by air.
- Do not apply by any type of irrigation system.

All outdoor applications must be limited to spot or crack-and-crevice treatments only, except for the following permitted uses:

- (1) Applications to soil or vegetation, as listed on this label, around structures;
- (2) Application to lawns, turf and other vegetation, as listed on this label;
- (3) Applications to the side of a building, up to a maximum height of 3 feet above grade;
- (4) Applications to underside of eaves, soffits, doors or windows permanently protected from rainfall by a covering, overhang, awning or other structure;
- (5) Applications around potential pest entry points into buildings, when limited to a surface band not to exceed one inch in width;
- (6) Applications made through the use of a coarse, low pressure spray to only those portions of surfaces that are directly above bare soil, lawn, turf, much or other vegetation, as listed on this label, and not over an impervious surface, drainage or other conditions that could result in runoff into storm drains, drainage ditches, gutters, or surface waters, in order to control occasional invaders or aggregating pests.

Other than applications to building foundations, all outdoor applications to impervious surfaces such as sidewalks, driveways, patios, porches and structural surfaces (such as windows, doors and eaves) are limited to spot and crack-and-crevice applications only.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food and feed. Store in original container and out of the reach of children, preferably in a locked storage area.

Handle and open container in a manner as to prevent spillage. If container is leaking, invert to prevent leakage. If container is leaking or if material is spilled for any reason or cause, carefully contain any spilled material to prevent non-target contamination. Do not walk through spilled material and dispose of as directed for pesticides below. Absorb spilled material with absorbing type compounds and dispose of as directed for pesticides below. Refer to *Precautionary Statements* on label for hazards associated with the handling of this material. In spill or leak incidents, keep unauthorized people away. You may contact Ensystex IV for decontamination procedures or any other assistance that may be necessary at 1-866-367-8467 or contact Chemtrec at 1-800-424-9300.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Handling: Nonrefillable container. Do not re-use or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

USE INFORMATION

BITHOR SC GC controls or suppresses a wide spectrum of insects and mites on turfgrass, trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants on golf courses. (Nonbearing crops are perennial crops that will not produce a harvestable raw agricultural commodity during the season of application.) BITHOR SC GC mixes readily with water and other aqueous carriers.

BITHOR SC GC is not for use on plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes. BITHOR SC GC is not for use in commercial greenhouses, nurseries, or on grasses grown for seed, turfgrass grown for sale (sod farms) or on commercial fruit and nut trees.

Some insects can develop resistance to products used repeatedly for their control. Because the development of resistance by an insect to an insecticide cannot be predicted, the use of this product should be according to established resistance management strategies. Consult your local or state pest management authorities for details.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing and cultural practices to control different types of pests.

APPLICATION FOR TURF PESTS

BITHOR SC GC can be used for the control of a wide range of listed pests of turfgrass on golf courses. Because BITHOR SC GC's active ingredients have long lasting residual activity, applications for control of subsurface feeders can be made before the occurrence of egg laying activity. BITHOR SC GC's active ingredients also have sufficient knockdown and residual activity to provide curative and residual control of surface feeding pests.

Do not apply more than 4.5 pints (0.25 lb imidacloprid, 0.1 lb bifenthrin) per acre per application or 1.65 fluid ounces per 1000 square feet per application of product to turf. Do not apply more than 9 pints (0.5 lb of imidacloprid active ingredient, 0.2 lb bifenthrin) per acre per year or 3.3 fluid ounces per 1000 square feet per year of product to turf.

Application Sites

Permitted sites include turfgrass on golf courses. **New York State only: Do not apply BITHOR SC GC containing solutions to grass or turf within 100 feet of a body of water (lake, pond, river, stream, wetland or drainage ditch).**

Not for use on sod farms.

Application Timing

The active ingredients in BITHOR SC GC have sufficiently long-lasting residual activity that applications can be made prior to egg laying by the target pest(s). Optimum control of turf pests will be achieved when application is made prior to egg hatch followed by sufficient irrigation or rainfall to move the active ingredient through the thatch and down into the underlying soil. Applications can be timed based on past experiences at the site or in the area, current results of adult monitoring/trapping or other methods.

Post Application Watering and Mowing

Optimum control is achieved if irrigation or rainfall occurs within 24 hours after application. Uniformity of application may be adversely affected if turf is mowed prior to irrigation/rainfall occurring.

Application Restrictions

- Keep people and pets off treated areas until spray has dried.
- Do not apply more than 9 pints (0.5 lb of imidacloprid active ingredient, 0.2 lb bifenthrin) per acre per year
- Do not mow turf or lawn area until after sufficient irrigation or rainfall has occurred so that uniformity of application will not be affected.
- Do not allow this product to contact plants in bloom while bees are foraging the treatment area.
- Do not graze treated areas or use clippings from treated areas for feed or forage.
- Do not allow runoff or puddling of irrigation water following application.
- Do not apply to areas which are waterlogged or saturated, which will not allow penetration into the root zone of the plant.

Application Preparation

BITHOR SC GC can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

Because certain cultivars may be sensitive to the final spray solution, test the effects of applications of different rates and volumes of mixed solution on a small patch of a type of grass (with observations over one week to detect the occurrence of negative effects) before application of solutions to large areas of that type of grass.

Application Equipment and Methods

Apply BITHOR SC GC mixed in water (according to the table below) as a spray of uniform, coarse droplets at a pressure low enough to eliminate drift from the target area. Properly calibrated application equipment must be used to apply BITHOR SC GC. Check calibration periodically to ensure that equipment is working properly.

Reapplication

Reapplications may be necessary particularly in the event of high pest pressure. Reapply as necessary, not to exceed 9 pints (0.5 lb of imidacloprid active ingredient, 0.2 lb bifenthrin) per acre per year, to achieve control using higher specified application rates as pest pressure and foliage area increases but make reapplications no more often than once every 7 days. **New York State only: Do make a single reapplication of BITHOR SC GC if there is renewed insect activity, but not sooner than two weeks after first application.**

Turf Pest Application Use Rates

Use rates for BITHOR SC GC for turf pests are stated in fluid ounces of BITHOR SC GC per 1000 square feet and pints per acre. The application use rates listed below provide control of the listed pests under normal conditions. Apply BITHOR SC GC at 0.67 to 1.65 fluid ounces per 1000 square feet or 1.8 to 9.0 pints per acre, depending on the target pest. Application rates for specific pests within this range are given below. Use the higher specified application rates when maximum residual control is needed. However, applications of up to 1.65 fluid ounce per 1000 square feet or 4.5 pints per acre are permitted at the discretion of the applicator to control any pest. Do not

apply more than 9 pints (0.5 lb of imidacloprid active ingredient, 0.2 lb bifenthrin) per acre per year or 3.3 fluid ounces per 1000 square feet of product per year to turf.

Turf Application Use Rates

Use Rate Table for BITHOR SC GC for Turf Applications		
Use Rate	Fluid ounces BITHOR SC GC per 1,000 square feet (Range)	Pints BITHOR SC GC per acre (Range)
A	1.32⇒1.65	3.6⇒4.5
B	1.32⇒1.65	3.6⇒4.5
B (single annual application)	2.64⇒3.33	7.2⇒9.0
C	0.9⇒1.65	2.3⇒4.5
D	0.67⇒1.65	1.8⇒4.5

1 fluid ounce = 2 tablespoons = 6 teaspoons

Do not use household utensils to measure BITHOR SC GC.

Turf Application Volumes

Apply the indicated amount of BITHOR SC GC mixed in a volume of water sufficient to adequately distribute the active ingredient to the target area(s) and to wet all foliage.

The calculated amount of BITHOR SC GC can be applied in any volume of water provided the maximum label rate is not exceeded. Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Calculating Amounts of BITHOR SC GC to Mix for Turf Pests

To mix and apply any amount of BITHOR SC GC for turf pests based on number of square feet, determine:

A = # of Square feet of area to be treated / 1000 (for example 5,500 sq. ft. / 1000 = 5.5)

B = Applicable BITHOR SC GC Use Rate (fluid ounces per 1000 square feet) for the target pest(s) from the Use Rate Table. If treating for more than one type of pest, select the highest rate.

Calculate the amount of BITHOR SC GC to mix for turf pests as follows:

Ounces BITHOR SC GC to use = A X B

Mix this amount of BITHOR SC GC in the amount of water needed to make the application.

To mix and apply any amount of BITHOR SC GC for turf pests based on number of acres, determine:

A = # of acres of area to be treated = square feet of area to be treated / 43,560 (1 acre = 43,560 sq. ft.)

B = Applicable BITHOR SC GC Use Rate (pints per acre) for the target pest(s) from the Use Rate Table. If treating for more than one type of pest, select the highest rate.

Calculate the amount of BITHOR SC GC to mix for turf pests as follows:

Pints BITHOR SC GC to use = A X B

Mix this amount of BITHOR SC GC in the amount of water needed to make the application.

1 Pint = 16 ounces

Turf Pests Grouped by Use Rates

Use Rate A: Annual bluegrass weevil, *Aphodius spp.*, Asiatic garden beetle, Black turfgrass ataenius, Black vine weevil, European chafer, European crane fly, Frit fly, Green June beetle, Japanese beetle, Northern masked chafer, Nuisance ants, Oriental beetle, *Phyllophaga spp.*, Southern masked chafer, Ticks

Use Rate B and Use Rate B (single annual application): Imported Fire Ant, Mole crickets

Use Rate C: Banks grass mites, Billbugs, Chinch bugs, Centipedes, Crickets, Earwigs, Fleas, Grasshoppers, Leafhoppers, Mealybugs, Millipedes, Mites, Pillbugs, Sowbugs

Use Rate D: Armyworms, Cutworms, Sod webworms

Application Recommendations Against Specific Turf Pests

Annual Bluegrass Weevil (*Hyperodes*) adults: Applications should be timed to control adult weevils as they leave their overwintering sites and move into grass areas. This movement generally begins when Forsythia is in full bloom and concludes when flowering dogwood (*cornus florida*) is in full bloom. Consult your Cooperative Extension Service for more specific information regarding application timing.

Armyworms, Cutworms and Sod Webworms: To ensure optimum control, delay watering (irrigation) or mowing for 24 hours after application. The highest specified application rate may be necessary during periods of highest pest pressure if the grass is being maintained at a mowing height of 1 inch or greater.

Billbug adults: Applications should be made when adults first appear in the spring or when chewed or brown grass indicates damage. Degree day models have been developed to optimize application timing. Consult your Cooperative Extension Service for information specific to your region. In temperate regions, spring applications targeting billbug adults will also provide control of over-wintered chinch bugs.

Chinch Bugs: Because they infest the base of grass plants, chinch bugs are often found in the thatch layer. Irrigation of the grass or high volume applications of solution can increase penetration of the solution to where the chinch bugs are located. Chinch bugs can be one of the most difficult turf pest to control. The highest specified application rates may be required to achieve effective control, particularly in the middle of the summer when both nymphs and adults are present.

Mites: To ensure optimal control of eriophyid mites, apply in combination with the labeled application rate of a surfactant. A second application, five to seven days after the first, may be necessary to achieve acceptable control.

Flea larvae: Flea larvae develop in the soil of shaded areas that are accessible to pets or other animals. Use a higher volume application when treating these areas to ensure penetration of the insecticide into the soil.

Imported Fire Ants: Combine broadcast treatments to control newly invading ants and mound treatments to eliminate existing ant colonies. If the soil is not moist, irrigate before application or use a high volume application. Apply broadcast treatments at 1.65 fluid oz. per 1,000 square feet. Mounds should be treated by diluting 1/3 fluid oz. (2 teaspoons) of BITHOR SC GC per gallon of water and applying 1 to 2 gallons of finished spray per mound. Treat the mounds with sufficient force to break their apex and allow the insecticide solution to flow into the ant tunnels. A four foot diameter circle around the mound should also be treated. For best results, apply in cool weather (65 - 80°F) or in early morning or late evening hours.

Mole Cricket adults: Adult mole cricket control is difficult to attain because of continuous invasion during the early spring. Applications, made as late in the day as possible, should be watered in with 0.5 inches of water immediately following treatment. Irrigating dry soil before application will bring crickets closer to the surface.

Mole Cricket nymphs: Grass areas that received intense adult mole cricket pressure in the spring should be treated immediately prior to peak egg hatch when young nymphs are located near the soil surface. Control of larger, more damaging, nymphs later in the year may require both higher application rates and more frequent applications to maintain acceptable control. Applications, made as late in the day as possible, should be watered in with 0.5 inches of water immediately following treatment. Irrigating dry soil before application will bring crickets closer to the surface.

Ticks (Including ticks that may transmit Lyme Disease and Rocky Mountain Spotted fever): Treat the entire area where exposure to ticks may occur. Avoid spot applications. Use higher spray volumes when treating areas with dense ground cover or heavy leaf litter. Ticks may be reintroduced from surrounding areas on host animals. Retreatment may be necessary to achieve and/or maintain control during periods of high pest pressure. Repeat application is necessary only if there are signs of renewed activity. Make repeat application no more than once per seven days, not to exceed 9 pints (0.5 lb of imidacloprid active ingredient, 0.2 lb bifenthrin) per acre per year.

Deer ticks (*Ixodes sp.*) have a complicated two year life cycle that involves four life stages. Applications should be made in the late fall and/or early spring to control adult ticks that are usually located on brush or grass above the soil surface and in mid to late spring to control larvae and nymphs that reside in the soil and leaf litter.

American dog ticks commonly congregate along paths or roadways where humans are likely to be encountered. Applications should be made as necessary from mid-spring to early fall to control their larvae, nymphs and adults.

FOLIAR AND BROADCAST APPLICATION FOR ORNAMENTAL PESTS

BITHOR SC GC, applied to foliage and broadcast on the soil, controls or suppresses a wide range of listed pests on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers (prior to bloom or after petal fall is complete), ground covers, bedding plants and foliage plants in golf course landscapes. (Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months.) BITHOR SC GC is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

BITHOR SC GC is a systemic insecticide meaning it can be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of BITHOR SC GC is realized when BITHOR SC GC is applied on or near a growing portion of the plant from which it may be translocated to other parts of the plant. Combining BITHOR SC GC with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant. Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. For this reason, applications should be made prior to anticipated pest infestation to achieve optimum levels of control. Foliar applications of BITHOR SC GC also have local systemic activity against insect pests.

For outdoor ornamentals, do not apply more than 9.0 pints (0.5 lb of imidacloprid and 0.2 lb of bifenthrin) per acre per year.

Application Restrictions

- Follow application restrictions on page [x] (note to reviewer – page number will be added to commercial label) to protect bees and other insect pollinators.
- Do not apply more than 9.0 pints (0.5 lb of imidacloprid and 0.2 lb of bifenthrin) per acre per year
- Keep people and pets off treated area until dry
- Do not apply this product, by any application method, to linden, basswood or other *Tilia* species in the State of Oregon.

Application Sites

For use on ornamental plants: trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants in golf course landscapes.

Application Preparation

BITHOR SC GC can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

Foliar Application

Ornamental Application to Control Ants

BITHOR SC GC can be used to indirectly control ants when applied to control aphids, scale insects, mealybugs and other sucking insects on ornamentals thereby limiting the amount of honeydew available.

Foliar Application Volumes and Application Methods

BITHOR SC GC mixes readily with water and may be used in many types of application equipment. Mix required amount of product (from the table below) with the amount of water required to uniformly wet foliage and apply as desired dependent upon the selected use pattern. When making foliar applications on hard to wet foliage such as holly, pine, or ivy, the addition of a spreader/ sticker is recommended. If concentrate or mist type spray equipment is used, an equivalent amount of product should be used on the area sprayed, as would be used in a dilute application. Begin treatments prior to establishment of high pest populations. Reapply as needed, not to exceed 9 pints (0.5 lb of imidacloprid active ingredient, 0.2 lb bifenthrin) per acre per year.

Foliar Application Use Rates

Use rates for BITHOR SC GC for foliar application for ornamental pests are stated in fluid ounces (and milliliters) of BITHOR SC GC per

100 gallons of water. The application rates listed below provide control of the listed pests under normal conditions.

Fluid ounces BITHOR SC GC per 100 gallons of water	Milliliters BITHOR SC GC per 100 gallons of water
6.7	202

1 fluid ounce = 2 tablespoons = 6 teaspoons

Do not use household utensils to measure BITHOR SC GC.

Ornamental Pests Controlled by Foliar Application

Adelgids, Aphids, Japanese beetles, Lacebugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Mealybugs, Psyllids, Sawfly larvae, Thrips (suppression), Whiteflies

Broadcast Application

Broadcast Application Volumes and Application Method

Mix required amount of product in a quantity of water sufficient to uniformly treat area. Use a minimum of 2 gallons of water per 1000 square feet. To achieve optimum control, irrigate treated area in order to incorporate treatment into upper level of soil.

Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

For outdoor ornamentals, broadcast applications cannot exceed a total of 9.0 pints (0.5 lb of imidacloprid and 0.2 lb of bifenthrin) per acre per year or 3.3 fluid ounces per 1000 square feet per year.

Broadcast Application Use Rates

Use rates for BITHOR SC GC for broadcast application for ornamental pests are stated in fluid ounces (and milliliters) of BITHOR SC GC per 1000 square feet. The application rates listed below provide control of the listed pests under normal conditions. Apply BITHOR SC GC at 0.67 to 1.65 fluid ounces per 1000 square feet, depending on the target pest. Application rates for specific pests within this range are given below. Use the higher specified application rates when maximum residual control is needed. However, applications of up to 1.65 fluid ounces per 1000 square feet are permitted at the discretion of the applicator to control any pest.

Use Rate Table for BITHOR SC GC for Broadcast Applications		
Use Rate	Fluid ounces BITHOR SC GC per 1000 square feet	Milliliters BITHOR SC GC per 1000 square feet
A	1.32⇒1.65	40⇒50
B	0.9⇒1.65	27⇒50
C	0.67⇒1.65	20.3⇒50

Ornamental Pests Controlled by Broadcast Application

Use Rate A: Annual bluegrass weevil, *Aphodius* spp., Asiatic garden beetle, Black turfgrass ateneus, Black vine weevil, European chafer, Green June beetle, Japanese beetle, Northern masked chafer, Oriental beetle, *Phyllophaga* spp., Southern masked chafer, Ticks

Use Rate B: Beetle adults (incl. Diaprepes, flea beetles, Japanese beetle and weevils), Billbugs, Chinch bugs, Centipedes, Crickets, Earwigs, Firebrats, Fleas, Fungus gnats, Grasshoppers, Leafhoppers, Mealybugs, Millipedes, Mites, Nuisance ants, Pillbugs, Scorpions, Sowbugs, Spiders, Springtails, Thrips

Use Rate C: Armyworms, Budworms, Cutworms, Leafrollers, Sod webworms

SOIL INJECTION AND SOIL DRENCH FOR ORNAMENTAL PESTS

BITHOR SC GC, applied as a soil drench or soil injection, controls or suppresses a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants and ground covers on golf courses. (Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months.) BITHOR SC GC is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

BITHOR SC GC is a systemic insecticide meaning it can be translocated by the plant's vascular system from the roots up into the

body of the plant. This means optimum effectiveness of BITHOR SC GC is realized when BITHOR SC GC is applied on or near a growing portion of the plant from which it may be translocated to other parts of the plant. Combining BITHOR SC GC with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant. Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. For this reason, applications should be made prior to anticipated pest infestation to achieve optimum levels of control.

Applications to trees for the control of existing borer infestations may not prevent the eventual loss of the tree due to existing damage already caused by the pest and stress to the tree caused by the pest infestation.

Application Restrictions

- Do not apply more than 9 pints (0.5 lb of imidacloprid active ingredient, 0.2 lb bifenthrin) per acre per year
- Keep people and pets off treated area until dry
- Do not apply to areas which are waterlogged or saturated, which will not allow penetration into the root zone of the plant
- Do not apply this product, by any application method, to linden, basswood or other *Tilia* species in the State of Oregon

Application Sites

For use on ornamental plants: trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants on golf courses.

Application Preparation

BITHOR SC GC can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

Ornamental Pests Controlled by Soil Injection or Drench Application

Adelgids, Aphids, Armored scales (suppression), Black vine weevil larvae, Eucalyptus longhorned borer, Flatheaded borers (including bronze birch borer and alder borer), Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Leaf miners, Mealybugs, Pine tip moth larvae, Psyllids, Royal palm bugs, Sawfly larvae, Soft scales, Thrips (suppression), White grub larvae, Whiteflies.

Soil Injection for Trees

Soil Injection is not allowed in Nassau and Suffolk Counties of New York.

Soil Injection Use Rate for Trees

Use Rate Table for BITHOR SC GC for Soil Injection for Trees
0.45 to 0.9 fluid ounces per inch of trunk diameter (D. B. H.) / 14 to 27 milliliters per inch of trunk diameter (D. B. H.)

Soil Injection Volumes and Application Method for Trees

Mix the calculated amount of BITHOR SC GC in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure according to one of the two following methods. Make a minimum of 4 injection holes per tree. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Grid Injection: Evenly space holes on 2.5 foot centers in a grid pattern in the soil beneath the tree's branches/foliage out to the tree's drip line.

Basal Injection: Evenly space injection holes around the base of the tree no more than 12 inches out from the tree.

Soil Drench for Trees

Soil Drench Use Rate for Trees

Use Rate Table for BITHOR SC GC for Soil Drench for Trees
0.45 to 0.9 fluid ounces per inch of trunk diameter (D. B. H.) / 14 to 27 milliliters per inch of trunk diameter (D. B. H.)

Soil Drench Volume and Application Method for Trees

Mix the calculated amount of BITHOR SC GC in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the tree directed to the root zone. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

Soil Injection for Shrubs

Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Shrubs

Use Rate Table for BITHOR SC GC for Soil Injection for Shrubs
0.45 to 0.9 fluid ounces per foot of shrub height 14 to 27 milliliters per foot of shrub height

Soil Injection Volume and Application Method for Shrubs

Mix the calculated amount of BITHOR SC GC in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply to individual plants using dosage indicated at a low pressure, making a minimum of 4 injection holes per shrub. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Soil Drench for Shrubs

Soil Drench Use Rate for Shrubs

Use Rate Table for BITHOR SC GC for Soil Drench for Shrubs
0.45 to 0.9 fluid ounces per foot of shrub height 14 to 27 milliliters per foot of shrub height

Soil Drench Volumes and Application Method for Shrubs

Mix the calculated amount of BITHOR SC GC in the amount of water determined to be adequate for the solution to be adequately dispersed, but at a rate no less than 10 gallons per 1000 square feet around the base of each shrub directed to the root zone. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier

Soil Incorporation for Flowers and Groundcovers

Apply as a broadcast soil treatment and incorporate into the soil before planting. Application can also be made after the plants are established prior to bloom or after all petals have fallen off; in this case best control is achieved if plants are irrigated after application.

Soil Incorporation Use Rate for Flowers and Groundcovers

Use Rate Table for BITHOR SC GC for Soil Incorporation for Flowers and Groundcovers
1.32 to 1.65 fluid ounces per 1000 square feet 40 to 50 milliliters per 1000 square feet

IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded. By using this product, user or buyer accepts the following conditions, disclaimer of warranties and limitations of liability.

CONDITIONS OF SALE: The Directions for Use of this product are believed to be adequate and must be followed carefully. However, because of manner of use and other factors beyond the control of Ensystex IV, Inc., it is impossible for Ensystex IV to eliminate all risks associated with the use of this product such as ineffectiveness or unintended consequences. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Ensystex IV harmless for any claims relating to such factors.

DISCLAIMER OF WARRANTIES: Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the Directions for Use under normal conditions of use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ENSYSTEX IV MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY

OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. Any warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, under abnormal conditions or under conditions not reasonably foreseeable by (or beyond the control of) seller or Ensystex IV, Inc., and buyer assumes the risk of any such use. No agent of Ensystex IV, Inc. is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein.

LIMITATIONS OF LIABILITY: To the extent permitted by law, Ensystex IV shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ENSYSTEIV AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ENSYSTEIV, THE REPLACEMENT OF THE PRODUCT.

This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

BITHOR is a registered trademark of Ensystex IV, Inc.

EPA [approval date]

Urbanski, Jennifer

From: Leanne Pruett [Leanne@PyxisRC.com]
Sent: Tuesday, January 14, 2014 2:07 PM
To: Urbanski, Jennifer
Subject: RE: 83923-1
Attachments: 083923-00001.20140114.Bithor SC GC bee protection language with EPA updates.pdf

Hey, Jenn –

Here's the update for the 83923-1.

I also added the new Ensysstex address, and added page numbers to the bottom of the label.

Best,
Leanne

From: Urbanski, Jennifer [mailto:urbanski.jennifer@epa.gov]
Sent: Monday, January 13, 2014 8:03 AM
To: Leanne Pruett
Subject: RE: 83923-1

Just a few more comments from the PM!

- 1) On page 2, delete the title "Non-Agricultural Use Sites", as the whole label is non-ag. Also, throughout the label, change "Follow application restrictions for Non-Agricultural Use Sites on page [x] to protect bees and other insect pollinators" to read "To protect bees and other insect pollinators, follow application restrictions on page [x]."
- 2) On page 3 under APPLICATION FOR TURF PESTS, change "...for the control for a wide range of pests..." to read "...for the control for a wide range of listed pests..."
- 3) On page 4 under Imported Fire Ants, change "Broadcast treatments should be applied..." to read "Apply broadcast treatments..."
- 4) On page 4 under Imported Fire Ants, change "The mounds should be treated..." to read "Treat the mounds..."
- 5) On page 4 under Ticks, change "Repeat application should be limited to..." to read "Make repeat application..."
- 6) On page 5 under FOLIAR AND BROADCAST APPLICATION FOR ORNAMENTAL PESTS, change "...a wide range of pests..." to read "...a wide range of listed pests..."
- 7) On page 5 under FOLIAR AND BROADCAST APPLICATION FOR ORNAMENTAL PESTS in the first paragraph and in Application Sites, delete flowers from the list of application sites or add "(prior to bloom or after petal fall is complete)".
- 8) On page 6 under Soil Incorporation for Flowers and Groundcovers, add "soil" between "broadcast" and "treatment".

From: Leanne Pruett [mailto:Leanne@PyxisRC.com]
Sent: Tuesday, January 07, 2014 6:27 PM
To: Urbanski, Jennifer
Subject: RE: 83923-1

Sorry – forgot to attach the 2013-01-10 Lois Rossi letter!

Here it is.

L.

From: Leanne Pruett
Sent: Tuesday, January 07, 2014 6:21 PM
To: 'Urbanski, Jennifer'
Subject: RE: 83923-1

Hi, Jenn –

Here's the updated label for the Bithor SC GC.

I wanted to point out a couple of things that I did with the labeling:

- When you told me that I wasn't using the most updated label and that there was text that was missing from the label, I updated the label to add the missing text – reading that text triggered my memory that I had done several label updates earlier this year where I amended non-ag pyrethroid labeling per Lois Rossi's January 10th 2013 letter (the letter slightly broadened the usage of pyrethroid products out of doors). This label did not have that update, so I've added the updated text, and I've also attached a copy of Lois Rossi's 1/10/13 letter, allowing the update – NOTE – if Venus would prefer that I not make this update at this time, and would like me to come in with a separate amendment, I'll be happy to do so, but since you are looking so closely at the label and we are updating other things, I thought this addition might be allowed
- On page 2, 'Application for Turf Pests', I caught a mistake – text read "Do not apply more than 4.5 pints (. . .) per acre per year or 1.65 fl. oz. per 1000 sq. ft. per application of product to turf. Do not apply more than 9 pints (. . .) per acre per year or 3.3 fl. oz. per 1000 sq. ft. per year of product to turf." The first '4.5 pints per acre per year' should be '4.5 pints per acre per application' – so I made that change
- I added the Oregon restriction in the two places you suggested, and in one or two other places as well.
- Changed 'Keep children and pets off treated areas' to 'Keep people and pets off treated areas'
- I deleted the 'ATTENTION' section at the end. Two of the restrictions I moved to the front of the label (no applying by air, no chemigation) – the other restrictions were already specified in the other 'Restrictions' section.

Best Regards,
Leanne

From: Urbanski, Jennifer [<mailto:urbanski.jennifer@epa.gov>]
Sent: Monday, December 30, 2013 12:57 PM
To: Leanne Pruett
Subject: 83923-1

Hey Leanne, attached are the first round of labeling comments for the above product, please send me the updated label as a response to this email. Thanks!

Jennifer Urbanski, Ph.D., Biologist
Insecticide-Rodenticide Branch, S7221
Registration Division (7505P)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460
(703) 347-0156



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

October 25, 2013

OFFICE OF CHEMICAL
SAFETY
AND POLLUTION
PREVENTION

JANELLE KAY
PYXIS REGULATORY CONSULTING, INC.
ENSYSTEX IV, INC
4110 136TH STREET
GIG HARBOR, WA 98332-

PRODUCT NAME: BITHOR SC GC
COMPANY NAME: ENSYSTEX IV, INC
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 83923-1
EPA RECEIPT DATE: 10/23/13

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 1, at (703) 308-8045.

Sincerely,

A handwritten signature in black ink, appearing to read "Seth".

Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division



Fee for Service

{9424552~

This package includes the following

- ☐ New Registration
- ☒ Amendment

☐ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: ____

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr. 1

Receipt No.

S- 942455

EPA File Symbol/Reg. No.

83923-1

Pin-Punch Date:

10/23/2013

☒ This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: \$ _____

Parent/Child Decisions:

☐ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: _____

Date: 10-25-13

Remarks:



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number Ensystex IV, Inc / 83923-1	2. EPA Product Manager V. Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ensystex IV, Inc. / Bithor SC GC	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) Ensystex III, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136th St., NW, Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This is a fast track amendment to incorporate the new pollinator protective language.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
* Certification must be submitted				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name P. Leanne Pruett	Title Agent	Telephone No. (Include Area Code) 253-653-7369
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Agent	
4. Typed Name P. Leanne Pruett	5. Date September 27, 2013	

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

September 27, 2013

Venus Eagle (PM1)
Document Processing Desk (AMEND)
Office of Pesticide Programs (7505P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501
ATTENTION: Pollinator Fast-Track Amendment

RE: Ensystex IV, Inc. – submission of label amendment to Imidacloprid products to add pollinator protection language, including the following products:

- Bithor SC GC (EPA Reg. No. 83923-1)
- Bithor SC (EPA Reg. No. 83923-2)
- Prothor SC 0.5 (EPA Reg. No. 83923-3)
- Prothor SC 2 (EPA Reg. No. 83923-4)
- Turfthor 2F (EPA Reg. No. 83923-5)

Dear Ms. Eagle,

On behalf of Ensystex IV, Inc., I am submitting a series of applications to amend the registrations of the above-listed subject products, to add pollinator protection language to the product labels. The language is being added in response to Steven Bradbury's August 15th, 2013 letter regarding Pollinator Protection Labeling for Nitroguanidine Neonicotinoid Products.

In support of these label amendments, the following documents are enclosed for each product:

1. EPA Application Form 8570-1
2. One (1) copy of product label with changes tracked
3. Three (3) copies of product label with changes incorporated
4. One copy of the proposed label on CD
5. Certification with respect to Label Integrity

Additionally, I have enclosed a letter of authorization, allowing Pyxis to act as Ensystex's agent with EPA.

As per Steven Bradbury's August 15, 2013 letter, these amendments qualify as non-PRIA fast track amendments. Please note we are not including amendments for Turfthor 2.5G or 0.5G (EPA Reg. No's 83923-9 and 83923-10), as they are granular products, and these updates are not required for granulars. If you have any questions or concerns regarding these amendment applications, or require additional information, please contact me at (253) 853-7369 or Leanne@PyxisRC.com.

Best Regards,



P. Leanne Pruett
Pyxis Regulatory Consulting

Enclosures
cc: Ensystex IV, Inc.

Certification with Respect to Label Integrity

version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL		
EPA Registration #	Date Submitted to EPA	Electronic file name
83923-1	September 27, 2013	083923-00001.20130927.Bithor SC GC bee protection language.PDF

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.



Signature

9-27-2013

Date

P. Leanne Pruett

Name (typed)

Agent

Title

Material to be added to an e-Jacket/Jacket

Reg. No. 83923-1

Decision # 435177

Description:

notification

1. Placement within the e-Jacket/jacket:

☐ Default: (chronological, top = newest)

☐ File Location: (eg. "before page 45 in .pdf")

2. ☒ Send to Data Extraction contractors this material:

☐ Newly stamped accepted label

☒ Notification

☐ New CSF

☐ Other: _____

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer: XC Bo 1

Division: RD

Phone: 306-0415

Date: 6-15-10



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

NOTIFICATION

JUN 16 2010

Ross Gilbert
Ensystex IV, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332

Subject: Label Notification(s) Per Agency Letter Dated June 4, 2009; Environmental
Hazard and General Labeling for Pyrethroid Non-Agricultural Outdoor
Products Notification

Dear Mr. Gilbert:

The Agency is in receipt of your applications for pesticide notifications, dated May
18, 2010, per Agency letter dated June 4, 2009.

EPA Registration 83923-1
EPA Registration 83923-2

Bithor SC GC
Bithor SC

The Registration Division (RD) has conducted a review of these requests for
applicability under Agency letter dated June 4, 2009, and find that the label changes
requested fall within the scope of the letter. The labels have been date-stamped
“*Notification*” and will be placed in our records.

If you have any questions, please contact me at (703) 306-0415 or
davis.kable@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Kable Bo Davis", written over a horizontal line.

Kable Bo Davis
Entomologist
Insecticide-Rodenticide Branch
Registration Division (7505P)

RESTRICTED USE PESTICIDE

Toxic to Fish and Aquatic Organisms

For retail sale to and use only by certified applicators or persons under their direct supervision and only for those uses covered by the certified applicator's certification.



NOTIFICATION

JUN 16 2010

BITHOR SC GC

For foliar and systemic control of insect pests of turfgrass, landscape ornamentals, shrubs and trees on golf courses.

Active Ingredient:	By Wt.
Imidacloprid	5.0%
Bifenthrin*	2.0%
Other Ingredients:	93.0%
TOTAL:	100.0%

*Cis isomers 97% minimum, trans isomers 3% maximum

Contains 0.45 pounds of imidacloprid and 0.18 pounds of bifenthrin per gallon

EPA Reg. No. 83923-1 EPA Est. XXXXX-XX-XXX

STOP – Read the label before use

KEEP OUT OF REACH OF CHILDREN

CAUTION

DO NOT USE THIS PRODUCT ON GOLF COURSES IN NASSAU COUNTY OR SUFFOLK COUNTY, NEW YORK

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (866-367-8467) or visit www.for-thor.com.

NET CONTENTS: As marked on container

Manufactured by:

ENSYSTEX IV, Inc.

Fayetteville, NC 28303

FIRST AID

If swallowed	<ul style="list-style-type: none">• Call poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by the poison control center or doctor.• Do not give anything to an unconscious person.
--------------	--

HOTLINE NUMBER

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-(800)-369-4352 for emergency medical treatment information.

NOTE TO PHYSICIAN

Note To Physician: No specific antidote is available. Treat the patient symptomatically. This product contains a pyrethroid. If large amounts have been ingested, milk, cream and other digestible fats and oils may increase absorption and so should be avoided.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove and wash contaminated clothing before reuse.

Personal Protective Equipment: Applicators and other handlers must wear long-sleeved shirt, long pants, shoes and socks. Follow manufacturer's instructions for cleaning/maintaining PPE. If there are no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations: Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Environmental Hazards

This product is extremely toxic to fish and aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate. Run-off may be hazardous to aquatic organisms in water adjacent to treated areas.

This product contains a chemical with properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Rinsing application equipment over the treated area will help avoid run off to water bodies and drainage systems.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirement specific to your State or Tribe, consult the agency responsible for pesticide regulation.

Do not allow children or pets on treated surfaces until the spray has dried.

Do not water the treated area to the point of run-off.

Do not make applications during rain.

Application is prohibited directly into sewers or drains, or to any area like a gutter where drainage to sewers, storm drains, water bodies, or aquatic habitat can occur. Do not allow the product to enter any drain during or after application.

All outdoor applications must be limited to spot or crack-and-crevice treatments only, except for the following permitted uses:

(1) Treatment to soil or vegetation around structures;

(2) Applications to lawns, turf, and other vegetation;

(3) Applications to building foundations, up to a maximum height of 3 feet.

Other than applications to building foundations, all outdoor applications to impervious surfaces such as sidewalks, driveways, patios, porches and structural surfaces (such as windows, doors and eaves) are limited to spot and crack-and-crevice applications only.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food and feed. Store in original container and out of the reach of children, preferably in a locked storage area.

Handle and open container in a manner as to prevent spillage. If container is leaking, invert to prevent leakage. If container is leaking or if material is spilled for any reason or cause, carefully contain any spilled material to prevent non-target contamination. Do not walk through spilled material and dispose of as directed for pesticides below. Absorb spilled material with absorbing type compounds and dispose of as directed for pesticides below. Refer to Precautionary Statements on label for hazards associated with the handling of this material. In spill or leak incidents, keep unauthorized people away. You may contact Ensysyst IV for decontamination procedures or any other assistance that may be necessary at 1-866-367-8467 or contact Chemtrec at 1-800-424-9300.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Nonrefillable container. Do not re-use or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

GENERAL INFORMATION

BITHOR SC GC controls or suppresses a wide spectrum of insects and mites on turfgrass, trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants on golf courses. (Nonbearing crops are perennial crops that do not produce a harvestable raw agricultural commodity during the season of application.) BITHOR SC GC mixes readily with water and other aqueous carriers.

BITHOR SC GC is not for use on plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes. BITHOR SC GC is not for use in commercial greenhouses, nurseries, or on grasses grown for seed, turfgrass grown for sale (sod farms) or on commercial fruit and nut trees.

Some insects can develop resistance to products used repeatedly for their control. Because the development of resistance by an insect to an insecticide cannot be predicted, the use of this product should be according to established resistance management strategies. Consult your local or state pest management authorities for details.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing and cultural practices to control different types of pests.

APPLICATION FOR TURF PESTS

BITHOR SC GC can be used for the control of a wide range of pests of turfgrass on golf courses. Because BITHOR SC GC's active ingredients have long lasting residual activity, applications for control of subsurface feeders can be made before the occurrence of egg laying activity. BITHOR SC GC's active ingredients also have sufficient knockdown and residual activity to provide curative and residual control of surface feeding pests.

Do not apply more than 4.5 pints (0.25 lb imidacloprid, 0.1 lb bifenthrin) per acre or 1.65 fluid ounces per 1000 square feet per application of product to turf. Do not apply more than 9 pints (0.5 lb of imidacloprid active ingredient, 0.2 lb bifenthrin) per acre or 3.3 fluid ounces per 1000 square feet per year of product to turf.

Application Sites

Permitted sites include turfgrass on golf courses. **New York State only:** Do not apply BITHOR SC GC containing solutions to grass or turf within 100 feet of a body of water (lake, pond, river, stream, wetland or drainage ditch).

Application Timing

The active ingredients in BITHOR SC GC have sufficiently long-lasting residual activity that applications can be made prior to egg laying by the target pest(s). Optimum control of turf pests will be achieved when application is made prior to egg hatch followed by sufficient irrigation or rainfall to move the active ingredient through the thatch and down into the underlying soil. Applications can be timed based on pest experiences at the site or in the area, current results of adult monitoring/trapping or other methods.

Post Application Watering and Mowing

Optimum control is achieved if irrigation or rainfall occurs within 24 hours after application. Uniformity of application may be adversely affected if turf is mowed prior to irrigation/rainfall occurring.

Application Precautions and Preparations

Keep children and pets off treated areas until spray has dried.

Application should not be made to turf that is frozen, waterlogged or is saturated with water. Turf in this condition will not allow the necessary vertical distribution of the active ingredient down into the soil.

BITHOR SC GC can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

Because certain cultivars may be sensitive to the final spray solution, test the effects of applications of different rates and volumes of mixed solution on a small patch of a type of grass (with observations over one week to detect the occurrence of negative effects) before application of solutions to large areas of that type of grass.

Application Equipment and Methods

Apply BITHOR SC GC mixed in water (according to the table below) as a spray of uniform, coarse droplets at a pressure low enough to eliminate drift from the target area. Properly calibrated application equipment must be used to apply BITHOR SC GC. Check calibration periodically to ensure that equipment is working properly.

Reapplication

Reapplications may be necessary particularly in the event of high pest pressure. Reapply as necessary to achieve control using higher application rates as pest pressure and foliage area increases but make reapplications no more often than once every 7 days. **New York State**

only: Do make a single reapplication of BITHOR SC GC if there is renewed insect activity, but not sooner than two weeks after first application.

Turf Pest Application Use Rates

Use rates for BITHOR SC GC for turf pests are stated in fluid ounces of BITHOR SC GC per 1000 square feet and pints per acre. The application use rates listed below provide control of the listed pests under normal conditions. Apply BITHOR SC GC at 0.67 to 1.65 fluid ounces per 1000 square feet or 1.8 to 9.0 pints per acre, depending on the target pest. Recommended rates for specific pests within this range are given below. Use the higher application rates when maximum residual control is needed. However, applications of up to 1.65 fluid ounce per 1000 square feet or 4.5 pints per acre are permitted at the discretion of the applicator to control any pest. Do not apply more than 9 pints (0.5 lb of imidacloprid active ingredient, 0.2 lb bifenthrin) per acre or 3.3 fluid ounces per 1000 square feet of product per year to turf.

Turf Application Use Rates

Use Rate Table for BITHOR SC GC for Turf Applications		
Use Rate	Fluid ounces BITHOR SC GC per 1,000 square feet (Range)	Pints BITHOR SC GC per acre (Range)
A	1.32→1.65	3.6→4.5
B	1.32→1.65	3.6→4.5
B (single annual application)	2.64→3.33	7.2→9.0
C	0.9→1.65	2.3→4.5
D	0.67→1.65	1.8→4.5

1 fluid ounce = 2 tablespoons = 6 teaspoons

Do not use household utensils to measure BITHOR SC GC.

Turf Application Volumes

Apply the indicated amount of BITHOR SC GC mixed in a volume of water sufficient to adequately distribute the active ingredient to the target area(s) and to wet all foliage.

The calculated amount of BITHOR SC GC can be applied in any volume of water provided the maximum label rate is not exceeded. Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Calculating Amounts of BITHOR SC GC to Mix for Turf Pests

To mix and apply any amount of BITHOR SC GC for turf pests based on number of square feet, determine:

A = # of Square feet of area to be treated / 1000 (for example 5,500 sq. ft. / 1000 = 5.5)

B = Applicable BITHOR SC GC Use Rate (fluid ounces per 1000 square feet) for the target pest(s) from the Use Rate Table. If treating for more than one type of pest, select the highest rate.

Calculate the amount of BITHOR SC GC to mix for turf pests as follows:

Ounces BITHOR SC GC to use = A X B

Mix this amount of BITHOR SC GC in the amount of water needed to make the application.

To mix and apply any amount of BITHOR SC GC for turf pests based on number of acres, determine:

A = # of acres of area to be treated = square feet of area to be treated / 43,560 (1 acre = 43,560 sq. ft.)

B = Applicable BITHOR SC GC Use Rate (pints per acre) for the target pest(s) from the Use Rate Table. If treating for more than one type of pest, select the highest rate.

Calculate the amount of BITHOR SC GC to mix for turf pests as follows:

Pints BITHOR SC GC to use = A X B

Mix this amount of BITHOR SC GC in the amount of water needed to make the application.

1 Pint = 16 ounces

Turf Pests Grouped by Use Rates

Use Rate A: Annual bluegrass weevil, *Aphodius* spp., Asiatic garden beetle, Black turfgrass ateansius, Black vine weevil, European chafer, European crane fly, Frit fly, Green June beetle, Japanese beetle, Northern masked chafer, Nuisance ants, Oriental beetle, *Phyllophaga* spp., Southern masked chafer, Ticks

Use Rate B and Use Rate B (single annual application): Imported Fire Ant, Mole crickets

Use Rate C: Banks grass mites, Billbugs, Chinch bugs, Centipedes, Crickets, Earwigs, Fleas, Grasshoppers, Leafhoppers, Mealybugs, Millipedes, Mites, Pillbugs, Sowbugs

Use Rate D: Armyworms, Cutworms, Sod webworms

Application Recommendations Against Specific Turf Pests

Annual Bluegrass Weevil (*Hyperodes*) adults: Applications should be timed to control adult weevils as they leave their overwintering sites and move into grass areas. This movement generally begins when Forsythia is in full bloom and concludes when flowering dogwood (*cornus florida*) is in full bloom. Consult your Cooperative Extension Service for more specific information regarding application timing.

Armyworms, Cutworms and Sod Webworms: To ensure optimum control, delay watering (irrigation) or mowing for 24 hours after application. The highest application rate may be necessary during periods of highest pest pressure if the grass is being maintained at a mowing height of 1 inch or greater.

Billbug adults: Applications should be made when adults first appear in the spring or when chewed or brown grass indicates damage. Degree day models have been developed to optimize application timing. Consult your Cooperative Extension Service for information specific to your region. In temperate regions, spring applications targeting billbug adults will also provide control of overwintered chinch bugs.

Chinch Bugs: Because they infest the base of grass plants, chinch bugs are often found in the thatch layer. Irrigation of the grass or high volume applications of solution can increase penetration of the solution to where the chinch bugs are located. Chinch bugs can be one of the most difficult turf pest to control. High application rates may be required to achieve effective control, particularly in the middle of the summer when both nymphs and adults are present.

Mites: To ensure optimal control of eriophyid mites, apply in combination with the labeled application rate of a surfactant. A second application, five to seven days after the first, may be necessary to achieve acceptable control.

Flea larvae: Flea larvae develop in the soil of shaded areas that are accessible to pets or other animals. Use a higher volume application when treating these areas to ensure penetration of the insecticide into the soil.

Imported Fire Ants: Combine broadcast treatments to control newly invading ants and mound treatments to eliminate existing ant colonies. If the soil is not moist, irrigate before application or use a high volume application. Broadcast treatments should be applied at 1.65 fluid oz. per 1,000 square feet. Mounds should be treated by diluting 1/3 fluid oz. (2 teaspoons) of BITHOR SC GC per gallon of water and applying 1 to 2 gallons of finished spray per mound. The mounds should be treated with sufficient force to break their apex and allow the insecticide solution to flow into the ant tunnels. A four foot diameter circle around the mound should also be treated. For best results, apply in cool weather (65 - 80°F) or in early morning or late evening hours.

Mole Cricket adults: Adult mole cricket control is difficult to attain because of continuous invasion during the early spring. Applications, made as late in the day as possible, should be watered in with 0.5 inches of water immediately following treatment. Irrigating dry soil before application will bring crickets closer to the surface.

Mole Cricket nymphs: Grass areas that received intense adult mole cricket pressure in the spring should be treated immediately prior to peak egg hatch when young nymphs are located near the soil surface. Control of larger, more damaging, nymphs later in the year may require both higher application rates and more frequent applications to maintain acceptable control. Applications, made as late in the day as possible, should be watered in with 0.5 inches of water immediately following treatment. Irrigating dry soil before application will bring crickets closer to the surface.

Ticks (including ticks that may transmit Lyme Disease and Rocky Mountain Spotted fever): Treat the entire area where exposure to ticks may occur. Avoid spot applications. Use higher spray volumes when treating areas with dense ground cover or heavy leaf litter. Ticks may be reintroduced from surrounding areas on host animals. Retreatment may be necessary to achieve and/or maintain control during periods of high pest pressure. Repeat application is necessary only if there are signs of renewed activity. Repeat application should be limited to no more than once per seven days.

Deer ticks (*Ixodes* sp.) have a complicated two year life cycle that involves four life stages. Applications should be made in the late fall and/or early spring to control adult ticks that are usually located on brush or grass above the soil surface and in mid to late spring to control larvae and nymphs that reside in the soil and leaf litter.

American dog ticks commonly congregate along paths or roadways where humans are likely to be encountered. Applications should be made as necessary from mid-spring to early fall to control their larvae, nymphs and adults.

FOLIAR AND BROADCAST APPLICATION FOR ORNAMENTAL PESTS

BITHOR SC GC, applied to foliage and broadcast on the soil, controls or suppresses a wide range of pests on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants in golf course landscapes. (Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months.) BITHOR SC GC is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

BITHOR SC GC is a systemic insecticide meaning it can be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of BITHOR SC GC is realized when BITHOR SC GC is applied on or near a growing portion of the plant from which it may be translocated to other parts of the plant. Combining BITHOR SC GC with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant. Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. For this reason, applications should be made prior to anticipated pest infestation to achieve optimum levels of control. Foliar applications of BITHOR SC GC also have local systemic activity against insect pests.

For outdoor ornamentals, broadcast applications cannot exceed a total of 9.0 pints (0.5 lb of imidacloprid and 0.2 lb of bifenthrin) per acre per year.

Application Sites

For use on ornamental plants including but not limited to trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants in golf course landscapes.

Application Preparation

BITHOR SC GC can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

Foliar Application

Ornamental Application to Control Ants

BITHOR SC GC can be used to indirectly control ants when applied to control aphids, scale insects, mealybugs and other sucking insects on ornamentals thereby limiting the amount of honeydew available.

Foliar Application Volumes and Application Methods

BITHOR SC GC mixes readily with water and may be used in many types of application equipment. Mix required amount of product (from the table below) with the amount of water required to uniformly wet foliage and apply as desired dependent upon the selected use pattern. When making foliar applications on hard to wet foliage such as holly, pine, or ivy, the addition of a spreader/sticker is recommended. If concentrate or mist type spray equipment is used, an equivalent amount of product should be used on the area sprayed, as would be used in a dilute application. Begin treatments prior to establishment of high pest populations. Reapply as needed.

Foliar Application Use Rates

Use rates for BITHOR SC GC for foliar application for ornamental pests are stated in fluid ounces (and milliliters) of BITHOR SC GC per 100 gallons of water. The application rates listed below provide control of the listed pests under normal conditions.

Fluid ounces BITHOR SC GC per 100 gallons of water	Milliliters BITHOR SC GC per 100 gallons of water
6.7	202

1 fluid ounce = 2 tablespoons = 6 teaspoons

Do not use household utensils to measure BITHOR SC GC.

Ornamental Pests Controlled by Foliar Application

Adelgids, Aphids, Japanese beetles, Lacebugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Mealybugs, Psyllids, Sawfly larvae, Thrips (suppression), Whiteflies

Broadcast Application

Broadcast Application Volumes and Application Method

Mix required amount of product in a quantity of water sufficient to uniformly treat area. Use a minimum of 2 gallons of water per 1000 square feet. To achieve optimum control, irrigate treated area in order to incorporate treatment into upper level of soil.

Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

For outdoor ornamentals, broadcast applications cannot exceed a total of 9.0 pints (0.5 lb of imidacloprid and 0.2 lb of bifenthrin) per acre or 3.3 fluid ounces per 1000 square feet per year.

Broadcast Application Use Rates

Use rates for BITHOR SC GC for broadcast application for ornamental pests are stated in fluid ounces (and milliliters) of BITHOR SC GC per 1000 square feet. The application rates listed below provide control of the listed pests under normal conditions. Apply BITHOR SC GC at 0.67 to 1.65 fluid ounces per 1000 square feet, depending on the target pest. Recommended rates for specific pests within this range are given below. Use the higher application rates when maximum residual control is needed. However, applications of up to 1.65 fluid ounces per 1000 square feet are permitted at the discretion of the applicator to control any pest.

Use Rate Table for BITHOR SC GC for Broadcast Applications		
Use Rate	Fluid ounces BITHOR SC GC per 1000 square feet	Milliliters BITHOR SC GC per 1000 square feet
A	1.32-1.65	40-50
B	0.9-1.65	27-50
C	0.67-1.65	20.3-50

Ornamental Pests Controlled by Broadcast Application

Use Rate A: Annual bluegrass weevil, *Aphodius* spp., Asiatic garden beetle, Black turfgrass atenioides, Black vine weevil, European chafer, Green June beetle, Japanese beetle, Northern masked chafer, Oriental beetle, *Phyllophaga* spp., Southern masked chafer, Ticks

Use Rate B: Beetle adults (incl. Diaprepes, flea beetles, Japanese beetle and weevils), Billbugs, Chinch bugs, Centipedes, Crickets, Earwigs, Firebrats, Fleas, Fungus gnats, Grasshoppers, Leafhoppers, Mealybugs, Millipedes, Mites, Nuisance ants, Pillbugs, Scorpions, Sowbugs, Spiders, Springtails, Thrips

Use Rate C: Armyworms, Budworms, Cutworms, Leafrollers, Sod webworms

SOIL INJECTION AND SOIL DRENCH FOR ORNAMENTAL PESTS

BITHOR SC GC, applied as a soil drench or soil injection, controls or suppresses a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants and ground covers on golf courses. (Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months.) BITHOR SC GC is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

BITHOR SC GC is a systemic insecticide meaning it can be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of BITHOR SC GC is realized when BITHOR SC GC is applied on or near a growing portion of the plant from which it may be translocated to other parts of the plant. Combining BITHOR SC GC with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant. Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. For this reason, applications should be made prior to anticipated pest infestation to achieve optimum levels of control.

Applications to trees for the control of existing borer infestations may not prevent the eventual loss of the tree due to existing damage already caused by the pest and stress to the tree caused by the pest infestation

Application Sites

For use on ornamental plants including but not limited to trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants on golf courses.

Application Preparation

BITHOR SC GC can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

Ornamental Pests Controlled by Soil Injection or Drench Application

Adelgids, Aphids, Armored scales (suppression), Black vine weevil larvae, Eucalyptus longhorned borer, Flatheaded borers (including bronze birch borer and alder borer), Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Leaf miners, Mealybugs, Pine tip moth larvae, Psyllids, Royal palm bugs, Sawfly larvae, Soft scales, Thrips (suppression), White grub larvae, Whiteflies.

Soil Injection for Trees

Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Trees

Use Rate Table for BITHOR SC GC for Soil Injection for Trees	
0.45 to 0.9 fluid ounces per inch of trunk diameter (D. B. H.) /	
14 to 27 milliliters per inch of trunk diameter (D. B. H.)	

Soil Injection Volumes and Application Method for Trees

Mix the calculated amount of BITHOR SC GC in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure according to one of the two following methods. Make a minimum of 4 injection holes per tree. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Grid Injection: Evenly space holes on 2.5 foot centers in a grid pattern in the soil beneath the tree's branches/foliage out to the tree's drip line.

Basal Injection: Evenly space injection holes around the base of the tree no more than 12 inches out from the tree.

Soil Drench for Trees

Soil Drench Use Rate for Trees

Use Rate Table for BITHOR SC GC for Soil Drench for Trees
0.45 to 0.9 fluid ounces per inch of trunk diameter (D. B. H.) /
14 to 27 milliliters per inch of trunk diameter (D. B. H.)

Soil Drench Volume and Application Method for Trees

Mix the calculated amount of BITHOR SC GC in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the tree directed to the root zone. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

Soil Injection for Shrubs

Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Shrubs

Use Rate Table for BITHOR SC GC for Soil Injection for Shrubs
0.45 to 0.9 fluid ounces per foot of shrub height
14 to 27 milliliters per foot of shrub height

Soil Injection Volume and Application Method for Shrubs

Mix the calculated amount of BITHOR SC GC in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply to individual plants using sage indicated at a low pressure, making a minimum of 4 injection holes per shrub. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Soil Drench for Shrubs

Soil Drench Use Rate for Shrubs

Use Rate Table for BITHOR SC GC for Soil Drench for Shrubs
0.45 to 0.9 fluid ounces per foot of shrub height
14 to 27 milliliters per foot of shrub height

Soil Drench Volumes and Application Method for Shrubs

Mix the calculated amount of BITHOR SC GC in the amount of water determined to be adequate for the solution to be adequately dispersed, but at a rate no less than 10 gallons per 1000 square feet around the base of each shrub directed to the root zone. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

Soil Incorporation for Flowers and Groundcovers

Apply as a broadcast treatment and incorporate into the soil before planting or apply after plants are established. If application is made to established plants, optimum control will be attained if area is irrigated thoroughly after application.

Soil Incorporation Use Rate for Flowers and Groundcovers

Use Rate Table for BITHOR SC GC for Soil Incorporation Groundcovers	for Flowers and
1.32 to 1.65 fluid ounces per 1000 square feet	
40 to 50 milliliters per 1000 square feet	

ATTENTION

Do not graze treated areas or use clippings from treated areas for feed or forage.

Avoid runoff or puddling of irrigation water following application.

Do not apply by air.

Do not apply by any type of irrigation system.

IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded. By using this product, user or buyer accepts the following conditions, disclaimer of warranties and limitations of liability.

CONDITIONS OF SALE: The Directions for Use of this product are believed to be adequate and must be followed carefully. However, because of manner of use and other factors beyond the control of Ensysyex IV, Inc., it is impossible for Ensysyex IV to eliminate all risks associated with the use of this product such as ineffectiveness or unintended consequences. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Ensysyex IV harmless for any claims relating to such factors.

DISCLAIMER OF WARRANTIES: Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the Directions for Use under normal conditions of use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ENSYSTEX IV MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. Any warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, under abnormal conditions or under conditions not reasonably foreseeable by (or beyond the control of) seller or Ensysyex IV, Inc., and buyer assumes the risk of any such use. No agent of Ensysyex IV, Inc. is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein.

LIMITATIONS OF LIABILITY: To the extent permitted by law, Ensysyex IV shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ENSYSTEX IV AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ENSYSTEX IV, THE REPLACEMENT OF THE PRODUCT.

This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

BITHOR is a registered trademark of Ensysyex IV, Inc.

EPA 20100518



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 83923-1	2. EPA Product Manager V.Eagle	3. Proposed Classification <input type="checkbox"/> None <input checked="" type="checkbox"/> Restricted
4. Company/Product (Name) Ensystex IV, Inc / Bithor SC GC	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) Ensystex IV, Inc c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____	NOTIFICATION JUN 16 2010
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.	
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.	

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of label change per June 4, 2009, letter from Environmental Protection Agency. This notification is consistent with the guidance in the June 4, 2009 letter and the requirements of EPA's regulations at 40 CFR part 156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR part 156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container 1 gallon		5. Location of Label Directions <input type="checkbox"/> On Label <input checked="" type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____					

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Ross Gilbert	Title Agent	Telephone No. (include Area Code) (253) 853-7369	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 	3. Title Agent		
4. Typed Name Ross Gilbert	5. Date 5/18/10		

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

May 18, 2010

COURIER DELIVERY

Venus Eagle (PM 1)
Document Processing Desk (**NOTIF-PYRETHROID**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: Ensystex IV, Inc. – Bithor SC GC (EPA Reg. No. 83923-1)
Revision to Environmental Hazards and Directions for Use per Environmental Hazard and
General Labeling for Pyrethroid Non-Agricultural Outdoor Products Notification EPA letter
dated June 4, 2009

Dear Ms. Eagle,

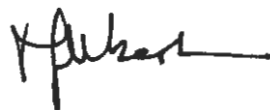
On behalf of Ensystex IV, Inc. please find the enclosed label notification revising the environmental hazards language and directions for use for Bithor SC GC per EPA's letter dated June 4, 2009.

In support of this notification submission, we submit the following documents:

1. Completed Application for Registration (EPA Form 8570-1)
2. One (1) copy of the Bithor SC GC labeling with changes tracked
3. One (1) copy of the Bithor SC GC labeling with changes incorporated
4. Certification with Respect to Label Integrity
5. One (1) copy of the Bithor SC GC labeling on CD

Please contact me by phone (253) 853-7369 or by email at Ross@PyxisRC.com if you have any questions or need any additional information.

Sincerely,



Ross Gilbert

Enclosures

cc: D. Nimocks; Ensystex IV, Inc.

Material to be added to an e-Jacket/Jacket

Reg. No. 83923-1

Description: _____

1. ☐ Placement within the e-Jacket/jacket:

- ☐ Default: (chronological, top = newest)
- ☐ File Location: (PDF page number, i.e., "before page 45")

2. ☐ Send to Data Extraction contractors this material:

- ☐ Newly stamped accepted label
- ☒ Notification
- ☐ New CSF
- ☐ Other: _____

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's Name: Dani Samir

Phone: 703 305-5405 Division: RD

Date: 03/25/200



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MAR 25 2010

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. Ross Gilbert
Pyxis Regulatory Consulting, Inc.
4110 136th Street NW
Gig Harbor, WA 98332

Subject: Revising of the Container Disposal Instructions

Dear Mr. Gilbert:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 dated March 5, 8, 10, 2010 for:

EPA Registration 82957-4

EPA Registration 83923-1 ✓

EPA Registration 83923-2

ENkS-010A

Bithor SC GC

Bithor SC

The Registration Division (RD) has conducted a review of this request for applicability under PRN 2007-4 and finds that the label change(s) requested falls within the scope of PRN-2007-4. The label has been date-stamped "Notification" and will be placed in our records.

If you have any questions, call me at 703 305-5409 or electronically at daniel.dani@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to be "Dani Daniel".

Dani Daniel
Registration Division (7504P)
Insecticide/Rodenticide Branch

NOTIFICATION

MAK 23 2010

RESTRICTED USE PESTICIDE

Toxic to Fish and Aquatic Organisms

For retail sale to and use only by certified applicators or persons under their direct supervision and only for those uses covered by the certified applicator's certification.



BITHOR SC GC

For foliar and systemic control of insect pests of turfgrass, landscape ornamentals, shrubs and trees on golf courses.

Active Ingredient:	By Wt.
Imidacloprid	5.0%
Bifenthrin*	2.0%
Other Ingredients:	93.0%
TOTAL:	100.0%

*Cis isomers 97% minimum, trans isomers 3% maximum

Contains 0.45 pounds of imidacloprid and 0.18 pounds of bifenthrin per gallon

EPA Reg. No. 83923-1 EPA Est. XXXXX-XX-XXX

STOP – Read the label before use

KEEP OUT OF REACH OF CHILDREN

CAUTION

DO NOT USE THIS PRODUCT ON GOLF COURSES IN NASSAU COUNTY OR SUFFOLK COUNTY, NEW YORK

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (866-367-8467) or visit www.for-thor.com.

NET CONTENTS: As marked on container

Manufactured by:

ENSYSTEX IV, Inc.

Fayetteville, NC 28303

FIRST AID

- Call poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by the poison control center or doctor.
- Do not give anything to an unconscious person.

HOTLINE NUMBER

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-(800)-369-4352 for emergency medical treatment information.

NOTE TO PHYSICIAN

Note To Physician: No specific antidote is available. Treat the patient symptomatically. This product contains a pyrethroid. If large amounts have been ingested, milk, cream and other digestible fats and oils may increase absorption and so should be avoided.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove and wash contaminated clothing before reuse.

Personal Protective Equipment: Applicators and other handlers must wear long-sleeved shirt, long pants, shoes and socks. Follow manufacturer's instructions for cleaning/maintaining PPE. If there are no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations: Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Environmental Hazards

This product is extremely toxic to fish and aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate. Run-off may be hazardous to aquatic organisms in water adjacent to treated areas.

This product contains a chemical with properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirement specific to your State or Tribe, consult the agency responsible for pesticide regulation.

Do not allow children or pets on treated surfaces until the spray has dried

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food and feed. Store in original container and out of the reach of children, preferably in a locked storage area.

Handle and open container in a manner as to prevent spillage. If container is leaking, invert to prevent leakage. If container is leaking or if material is spilled for any reason or cause, carefully contain any spilled material to prevent non-target contamination. Do not walk through spilled material and dispose of as directed for pesticides below. Absorb spilled material with absorbing type compounds and dispose of as directed for pesticides below. Refer to *Precautionary Statements* on label for hazards associated with the handling of this material. In spill or leak incidents, keep unauthorized people away. You may contact Ensystex IV for decontamination procedures or any other assistance that may be necessary at 1-866-367-8467 or contact Chemtrec at 1-800-424-9300.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or if allowed by state and local authorities, by burning. If burned, stay out of smoke. Nonrefillable container. Do not re-use or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

GENERAL INFORMATION

BITHOR SC GC controls or suppresses a wide spectrum of insects and mites on turfgrass, trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants on golf courses. (Nonbearing crops are perennial crops that will not produce a harvestable raw agricultural commodity during the season of application.) BITHOR SC GC mixes readily with water and other aqueous carriers.

BITHOR SC GC is not for use on plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes. BITHOR SC GC is not for use in commercial greenhouses, nurseries, or on grasses grown for seed, turfgrass grown for sale (sod farms) or on commercial fruit and nut trees.

Some insects can develop resistance to products used repeatedly for their control. Because the development of resistance by an insect to an insecticide cannot be predicted, the use of this product should be according to established resistance management strategies. Consult your local or state pest management authorities for details.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing and cultural practices to control different types of pests.

APPLICATION FOR TURF PESTS

BITHOR SC GC can be used for the control of a wide range of pests of turfgrass on golf courses. Because BITHOR SC GC's active ingredients have long lasting residual activity, applications for control of subsurface feeders can be made before the occurrence of egg laying activity. BITHOR SC GC's active ingredients also have sufficient knockdown and residual activity to provide curative and residual control of surface feeding pests.

Do not apply more than 4.5 pints (0.25 lb imidacloprid, 0.1 lb bifenthrin) per acre or 1.65 fluid ounces per 1000 square feet per application of product to turf. Do not apply more than 9 pints (0.5 lb of imidacloprid active ingredient, 0.2 lb bifenthrin) per acre or 3.3 fluid ounces per 1000 square feet per year of product to turf.

Application Sites

Permitted sites include turfgrass on golf courses. **New York State only: Do not apply BITHOR SC GC containing solutions to grass or turf within 100 feet of a body of water (lake, pond, river, stream, wetland or drainage ditch).**

Application Timing

The active ingredients in BITHOR SC GC have sufficiently long-lasting residual activity that applications can be made prior to egg laying by the target pest(s). Optimum control of turf pests will be achieved when application is made prior to egg hatch followed by sufficient irrigation or rainfall to move the active ingredient through the thatch and down into the underlying soil. Applications can be timed based on pest experiences at the site or in the area, current results of adult monitoring/trapping or other methods.

Post Application Watering and Mowing

Optimum control is achieved if irrigation or rainfall occurs within 24 hours after application. Uniformity of application may be adversely affected if turf is mowed prior to irrigation/rainfall occurring.

Application Precautions and Preparations

Keep children and pets off treated areas until spray has dried.

Application should not be made to turf that is frozen, waterlogged or is saturated with water. Turf in this condition will not allow the necessary vertical distribution of the active ingredient down into the soil.

BITHOR SC GC can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

Because certain cultivars may be sensitive to the final spray solution, test the effects of applications of different rates and volumes of mixed solution on a small patch of a type of grass (with observations over one week to detect the occurrence of negative effects) before application of solutions to large areas of that type of grass.

Application Equipment and Methods

Apply BITHOR SC GC mixed in water (according to the table below) as a spray of uniform, coarse droplets at a pressure low enough to eliminate drift from the target area. Properly calibrated application equipment must be used to apply BITHOR SC GC. Check calibration periodically to ensure that equipment is working properly.

Reapplication

Reapplications may be necessary particularly in the event of high pest pressure. Reapply as necessary to achieve control using higher application rates as pest pressure and foliage area increases but make reapplications no more often than once every 7 days. **New York State only: Do make a single reapplication of BITHOR SC GC if there is renewed insect activity, but not sooner than two weeks after first application.**

Turf Pest Application Use Rates

Use rates for BITHOR SC GC for turf pests are stated in fluid ounces of BITHOR SC GC per 1000 square feet and pints per acre. The application use rates listed below provide control of the listed pests under normal conditions. Apply BITHOR SC GC at 0.67 to 1.65 fluid ounces per 1000 square feet or 1.8 to 9.0 pints per acre, depending on the target pest. Recommended rates for specific pests within this range are given below. Use the higher application rates when maximum residual control is needed. However, applications of up to 1.65 fluid ounce per 1000 square feet or 4.5 pints per acre are permitted at the discretion of the applicator to control any pest. Do not apply more than 9 pints (0.5 lb of imidacloprid active ingredient, 0.2 lb bifenthrin) per acre or 3.3 fluid ounces per 1000 square feet of product per year to turf.

Turf Application Use Rates

Use Rate Table for BITHOR SC GC for Turf Applications		
Use Rate	Fluid ounces BITHOR SC GC per 1,000 square feet (Range)	Pints BITHOR SC GC per acre (Range)
A	1.32→1.65	3.6→4.5
B	1.32→1.65	3.6→4.5
B (single annual application)	2.64→3.33	7.2→9.0
C	0.9→1.65	2.3→4.5
D	0.67→1.65	1.8→4.5

1 fluid ounce = 2 tablespoons = 6 teaspoons

Do not use household utensils to measure BITHOR SC GC.

Turf Application Volumes

Apply the indicated amount of BITHOR SC GC mixed in a volume of water sufficient to adequately distribute the active ingredient to the target area(s) and to wet all foliage.

The calculated amount of BITHOR SC GC can be applied in any volume of water provided the maximum label rate is not exceeded. Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Calculating Amounts of BITHOR SC GC to Mix for Turf Pests

To mix and apply any amount of BITHOR SC GC for turf pests based on number of square feet, determine:

A = # of Square feet of area to be treated / 1000 (for example 5,500 sq. ft. / 1000 = 5.5)

B = Applicable BITHOR SC GC Use Rate (fluid ounces per 1000 square feet) for the target pest(s) from the Use Rate Table. If treating for more than one type of pest, select the highest rate.

Calculate the amount of BITHOR SC GC to mix for turf pests as follows:

Ounces BITHOR SC GC to use = A X B

Mix this amount of BITHOR SC GC in the amount of water needed to make the application.

To mix and apply any amount of BITHOR SC GC for turf pests based on number of acres, determine:

A = # of acres of area to be treated = square feet of area to be treated / 43,560 (1 acre = 43,560 sq. ft.)

B = Applicable BITHOR SC GC Use Rate (pints per acre) for the target pest(s) from the Use Rate Table. If treating for more than one type of pest, select the highest rate.

Calculate the amount of BITHOR SC GC to mix for turf pests as follows:

Pints BITHOR SC GC to use = A X B

Mix this amount of BITHOR SC GC in the amount of water needed to make the application.

1 Pint = 16 ounces

Turf Pests Grouped by Use Rates

Use Rate A: Annual bluegrass weevil, *Aphodius* spp., Asiatic garden beetle, Black turfgrass ateniinus, Black vine weevil, European chafer, European crane fly, Frit fly, Green June beetle, Japanese beetle, Northern masked chafer, Nuisance ants, Oriental beetle, *Phyllophaga* spp., Southern masked chafer, Ticks

Use Rate B and Use Rate B (single annual application): Imported Fire Ant, Mole crickets

Use Rate C: Banks grass mites, Billbugs, Chinch bugs, Centipedes, Crickets, Earwigs, Fleas, Grasshoppers, Leafhoppers, Mealybugs, Millipedes, Mites, Pillbugs, Sowbugs

Use Rate D: Armyworms, Cutworms, Sod webworms

Application Recommendations Against Specific Turf Pests

Annual Bluegrass Weevil (Hyperodes) adults: Applications should be timed to control adult weevils as they leave their overwintering sites and move into grass areas. This movement generally begins when Forsythia is in full bloom and concludes when flowering dogwood (*cornus florida*) is in full bloom. Consult your Cooperative Extension Service for more specific information regarding application timing.

Armyworms, Cutworms and Sod Webworms: To ensure optimum control, delay watering (irrigation) or mowing for 24 hours after application. The highest application rate may be necessary during periods of highest pest pressure if the grass is being maintained at a mowing height of 1 inch or greater.

Billbug adults: Applications should be made when adults first appear in the spring or when chewed or brown grass indicates damage. Degree day models have been developed to optimize application timing. Consult your Cooperative Extension Service for information specific to your region. In temperate regions, spring applications targeting billbug adults will also provide control of over-wintered chinch bugs.

Chinch Bugs: Because they infest the base of grass plants, chinch bugs are often found in the thatch layer. Irrigation of the grass or high volume applications of solution can increase penetration of the solution to where the chinch bugs are located. Chinch bugs can be one of the most difficult turf pest to control. High application rates may be required to achieve effective control, particularly in the middle of the summer when both nymphs and adults are present.

Mites: To ensure optimal control of eriophyid mites, apply in combination with the labeled application rate of a surfactant. A second application, five to seven days after the first, may be necessary to achieve acceptable control.

Flea larvae: Flea larvae develop in the soil of shaded areas that are accessible to pets or other animals. Use a higher volume application when treating these areas to ensure penetration of the insecticide into the soil.

Imported Fire Ants: Combine broadcast treatments to control newly invading ants and mound treatments to eliminate existing ant colonies. If the soil is not moist, irrigate before application or use a high volume application. Broadcast treatments should be applied at 1.65 fluid oz. per 1,000 square feet. Mounds should be treated by diluting 1/3 fluid oz. (2 teaspoons) of BITHOR SC GC per gallon of water and applying 1 to 2 gallons of finished spray per mound. The mounds should be treated with sufficient force to break their apex and allow the insecticide solution to flow into the ant tunnels. A four foot diameter circle around the mound should also be treated. For best results, apply in cool weather (65 - 80°F) or in early morning or late evening hours.

Mole Cricket adults: Adult mole cricket control is difficult to attain because of continuous invasion during the early spring. Applications, made as late in the day as possible, should be watered in with 0.5 inches of water immediately following treatment. Irrigating dry soil before application will bring crickets closer to the surface.

Mole Cricket nymphs: Grass areas that received intense adult mole cricket pressure in the spring should be treated immediately prior to peak egg hatch when young nymphs are located near the soil surface. Control of larger, more damaging, nymphs later in the year may require both higher application rates and more frequent applications to maintain acceptable control. Applications, made as late in the day as possible, should be watered in with 0.5 inches of water immediately following treatment. Irrigating dry soil before application will bring crickets closer to the surface.

Ticks (Including ticks that may transmit Lyme Disease and Rocky Mountain Spotted fever): Treat the entire area where exposure to ticks may occur. Avoid spot applications. Use higher spray volumes when treating areas with dense ground cover or heavy leaf litter. Ticks may be reintroduced from surrounding areas on host animals. Retreatment may be necessary to achieve and/or maintain control during periods of high pest pressure. Repeat application is necessary only if there are signs of renewed activity. Repeat application should be limited to no more than once per seven days.

Deer ticks (*Ixodes* sp.) have a complicated two year life cycle that involves four life stages. Applications should be made in the late fall and/or early spring to control adult ticks that are usually located on brush or grass above the soil surface and in mid to late spring to control larvae and nymphs that reside in the soil and leaf litter.

American dog ticks commonly congregate along paths or roadways where humans are likely to be encountered. Applications should be made as necessary from mid-spring to early fall to control their larvae, nymphs and adults.

FOLIAR AND BROADCAST APPLICATION FOR ORNAMENTAL PESTS

BITHOR SC GC, applied to foliage and broadcast on the soil, controls or suppresses a wide range of pests on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants in golf course landscapes. (Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months.) BITHOR SC GC is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

BITHOR SC GC is a systemic insecticide meaning it can be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of BITHOR SC GC is realized when BITHOR SC GC is applied on or near a growing portion of the plant from which it may be translocated to other parts of the plant. Combining BITHOR SC GC with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant. Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. For this reason, applications should be made prior to anticipated pest infestation to achieve optimum levels of control. Foliar applications of BITHOR SC GC also have local systemic activity against insect pests.

For outdoor ornamentals, broadcast applications cannot exceed a total of 9.0 pints (0.5 lb of imidacloprid and 0.2 lb of bifenthrin) per acre per year.

Application Sites

For use on ornamental plants including but not limited to trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants in golf course landscapes.

Application Preparation

BITHOR SC GC can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

Foliar Application

Ornamental Application to Control Ants

BITHOR SC GC can be used to indirectly control ants when applied to control aphids, scale insects, mealybugs and other sucking insects on ornamentals thereby limiting the amount of honeydew available.

Foliar Application Volumes and Application Methods

BITHOR SC GC mixes readily with water and may be used in many types of application equipment. Mix required amount of product (from the table below) with the amount of water required to uniformly wet foliage and apply as desired dependent upon the selected use pattern. When making foliar applications on hard to wet foliage such as holly, pine, or ivy, the addition of a spreader/sticker is recommended. If concentrate or mist type spray equipment is used, an equivalent amount of product should be used on the area sprayed, as would be used in a dilute application. Begin treatments prior to establishment of high pest populations. Reapply as needed.

Foliar Application Use Rates

Use rates for BITHOR SC GC for foliar application for ornamental pests are stated in fluid ounces (and milliliters) of BITHOR SC GC per 100 gallons of water. The application rates listed below provide control of the listed pests under normal conditions.

Fluid ounces BITHOR SC GC per 100 gallons of water	Milliliters BITHOR SC GC per 100 gallons of water
6.7	202

1 fluid ounce = 2 tablespoons = 6 teaspoons

Do not use household utensils to measure BITHOR SC GC.

Ornamental Pests Controlled by Foliar Application

Adelgids, Aphids, Japanese beetles, Lacebugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Mealybugs, Psyllids, Sawfly larvae, Thrips (suppression), Whiteflies

Broadcast Application

Broadcast Application Volumes and Application Method

Mix required amount of product in a quantity of water sufficient to uniformly treat area. Use a minimum of 2 gallons of water per 1000 square feet. To achieve optimum control, irrigate treated area in order to incorporate treatment into upper level of soil.

Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

For outdoor ornamentals, broadcast applications cannot exceed a total of 9.0 pints (0.5 lb of imidacloprid and 0.2 lb of bifenthrin) per acre or 3.3 fluid ounces per 1000 square feet per year.

Broadcast Application Use Rates

Use rates for BITHOR SC GC for broadcast application for ornamental pests are stated in fluid ounces (and milliliters) of BITHOR SC GC per 1000 square feet. The application rates listed below provide control of the listed pests under normal conditions. Apply BITHOR SC GC at 0.67 to 1.65 fluid ounces per 1000 square feet, depending on the target pest. Recommended rates for specific pests within this range are given below. Use the higher application rates when maximum residual control is needed. However, applications of up to 1.65 fluid ounces per 1000 square feet are permitted at the discretion of the applicator to control any pest.

Use Rate Table for BITHOR SC GC for Broadcast Applications		
Use Rate	Fluid ounces BITHOR SC GC per 1000 square feet	Milliliters BITHOR SC GC per 1000 square feet
A	1.32-1.65	40-50
B	0.9-1.65	27-50
C	0.67-1.65	20.3-50

Ornamental Pests Controlled by Broadcast Application

Use Rate A: Annual bluegrass weevil, *Aphodius* spp., Asiatic garden beetle, Black turfgrass ateletus, Black vine weevil, European chafer, Green June beetle, Japanese beetle, Northern masked chafer, Oriental beetle, *Phyllophaga* spp., Southern masked chafer, Ticks

Use Rate B: Beetle adults (incl. Diaprepes, flea beetles, Japanese beetle and weevils), Billbugs, Chinch bugs, Centipedes, Crickets, Earwigs, Firebrats, Fleas, Fungus gnats, Grasshoppers, Leafhoppers, Mealybugs, Millipedes, Mites, Nuisance ants, Pillbugs, Scorpions, Sowbugs, Spiders, Springtails, Thrips

Use Rate C: Armyworms, Budworms, Cutworms, Leafrollers, Sod webworms

SOIL INJECTION AND SOIL DRENCH FOR ORNAMENTAL PESTS

BITHOR SC GC, applied as a soil drench or soil injection, controls or suppresses a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants and ground covers on golf courses. (Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months.) BITHOR SC GC is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

BITHOR SC GC is a systemic insecticide meaning it can be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of BITHOR SC GC is realized when BITHOR SC GC is applied on or near a growing portion of the plant from which it may be translocated to other parts of the plant. Combining BITHOR SC GC with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant. Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. For this reason, applications should be made prior to anticipated pest infestation to achieve optimum levels of control.

Applications to trees for the control of existing borer infestations may not prevent the eventual loss of the tree due to existing damage already caused by the pest and stress to the tree caused by the pest infestation.

Application Sites

For use on ornamental plants including but not limited to trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants on golf courses.

Application Preparation

BITHOR SC GC can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

Ornamental Pests Controlled by Soil Injection or Drench Application

Adelgids, Aphids, Armored scales (suppression), Black vine weevil larvae, Eucalyptus longhorned borer, Flatheaded borers (including bronze birch borer and alder borer), Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Leaf miners, Mealybugs, Pine tip moth larvae, Psyllids, Royal palm bugs, Sawfly larvae, Soft scales, Thrips (suppression), White grub larvae, Whiteflies.

Soil Injection for Trees

Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Trees

Use Rate Table for BITHOR SC GC for Soil Injection for Trees
0.45 to 0.9 fluid ounces per inch of trunk diameter (D. B. H.) / 14 to 27 milliliters per inch of trunk diameter (D. B. H.)

Soil Injection Volumes and Application Method for Trees

Mix the calculated amount of BITHOR SC GC in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure according to one of the two following methods. Make a minimum of 4 injection holes per tree. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Grid Injection: Evenly space holes on 2.5 foot centers in a grid pattern in the soil beneath the tree's branches/foliage out to the tree's drip line.

Basal Injection: Evenly space injection holes around the base of the tree no more than 12 inches out from the tree.

Soil Drench for Trees

Soil Drench Use Rate for Trees

Use Rate Table for BITHOR SC GC for Soil Drench for Trees
0.45 to 0.9 fluid ounces per inch of trunk diameter (D. B. H.) / 14 to 27 milliliters per inch of trunk diameter (D. B. H.)

Soil Drench Volume and Application Method for Trees

Mix the calculated amount of BITHOR SC GC in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the tree directed to the root zone. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

Soil Injection for Shrubs

Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Shrubs

Use Rate Table for BITHOR SC GC for Soil Injection for Shrubs
0.45 to 0.9 fluid ounces per foot of shrub height
14 to 27 milliliters per foot of shrub height

Soil Injection Volume and Application Method for Shrubs

Mix the calculated amount of BITHOR SC GC in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply to individual plants using dosage indicated at a low pressure, making a minimum of 4 injection holes per shrub. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Soil Drench for Shrubs

Soil Drench Use Rate for Shrubs

Use Rate Table for BITHOR SC GC for Soil Drench for Shrubs
0.45 to 0.9 fluid ounces per foot of shrub height
14 to 27 milliliters per foot of shrub height

Soil Drench Volumes and Application Method for Shrubs

Mix the calculated amount of BITHOR SC GC in the amount of water determined to be adequate for the solution to be adequately dispersed, but at a rate no less than 10 gallons per 1000 square feet around the base of each shrub directed to the root zone. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

Soil Incorporation for Flowers and Groundcovers

Apply as a broadcast treatment and incorporate into the soil before planting or apply after plants are established. If application is made to established plants, optimum control will be attained if area is irrigated thoroughly after application.

Soil Incorporation Use Rate for Flowers and Groundcovers

Use Rate Table for BITHOR SC GC for Soil Incorporation Groundcovers	for Flowers and Groundcovers
1.32 to 1.65 fluid ounces per 1000 square feet	
40 to 50 milliliters per 1000 square feet	

ATTENTION

- Do not graze treated areas or use clippings from treated areas for feed or forage.
- Avoid runoff or puddling of irrigation water following application.
- Do not apply by air.
- Do not apply by any type of irrigation system.

IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded. By using this product, user or buyer accepts the following conditions, disclaimer of warranties and limitations of liability.

CONDITIONS OF SALE: The Directions for Use of this product are believed to be adequate and must be followed carefully. However, because of manner of use and other factors beyond the control of Ensysytex IV, Inc., it is impossible for Ensysytex IV to eliminate all risks associated with the use of this product such as ineffectiveness or unintended consequences. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Ensysytex IV harmless for any claims relating to such factors.

DISCLAIMER OF WARRANTIES: Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the Directions for Use under normal conditions of use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ENSYSTEX IV MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. Any warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, under abnormal conditions or under conditions not reasonably foreseeable by (or beyond the control of) seller or Ensysytex IV, Inc., and buyer assumes the risk of any such use. No agent of Ensysytex IV, Inc. is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein.

LIMITATIONS OF LIABILITY: To the extent permitted by law, Ensysytex IV shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ENSYSTEX IV AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ENSYSTEX IV, THE REPLACEMENT OF THE PRODUCT.

This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

BITHOR is a registered trademark of Ensysytex IV, Inc.

Revised 4/9/03/10



United States
Environmental Protection Agency
Washington, DC 20460

NOTIFICATION
MAR 25 2010

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 83923-1	2. EPA Product Manager V. Eagle	3. Proposed Classification <input type="checkbox"/> None <input checked="" type="checkbox"/> Restricted
4. Company/Product (Name) Ensystex IV, Inc. / Bithor SC GC	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) Ensystex IV, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of label change per PR Notice 2007-4. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container 1 gallon		5. Location of Label Directions <input type="checkbox"/> On Label <input checked="" type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Ross Gilbert		Title Agent		Telephone No. (Include Area Code) (253) 853-7369	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Agent			
4. Typed Name Ross Gilbert		5. Date 3/8/10			

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

March 8, 2010

COURIER DELIVERY

Venus Eagle (PM 1)
Document Processing Desk (**NOTIF**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: Ensystex IV, Inc. – Bithor SC GC (EPA Reg. No. 83923-1)
Revision to Container Disposal Instructions per PRN 2007-4

Dear Ms. Eagle,

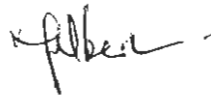
On behalf of Ensystex IV, Inc. please find the enclosed label notification revising the container disposal instructions for Bithor SC GC per PRN 2007-4.

In support of this notification submission, we submit the following documents:

1. Completed Application for Registration (EPA Form 8570-1)
2. One (1) copy of the Bithor SC GC labeling with changes tracked
3. One (1) copy of the Bithor SC GC labeling with changes incorporated
4. Certification with Respect to Label Integrity
5. One (1) copy of the Bithor SC GC labeling on CD

Please feel free to contact me by phone (253) 853-7369 or by email at Ross@PyxisRC.com if you have any questions or need any additional information.

Sincerely,



Ross Gilbert

Enclosures

cc: D. Nimocks; Ensystex IV, Inc

Certification with Respect to Label Integrity

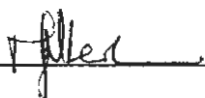
version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL		
EPA Registration #	Date Submitted to EPA	Electronic file name
83923-1	March 8, 2010	083923-00001.2010308.PRN 2007-4 lbl notification.pdf

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

Signature



Date

3/8/10

Ross Gilbert

Name (typed)

Agent

Title

Material to be added to an e-Jacket/Jacket

Reg. No. 83923-1

Description: _____

1. ☐ Placement within the e-Jacket/jacket:

- ☐ Default: (chronological, top = newest)
 - ☐ File Location: (PDF page number, i.e., "before page 45")
- _____
- _____

2. ☐ Send to Data Extraction contractors this material:

- ☐ Newly stamped accepted label
- ☐ Notification
- ☒ ~~New~~ CSF (Rejected)
- ☐ Other: _____

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's Name: Aami Samil

Phone: 703 305-5409 Division: POJ

Date: 11/24/09

Created August 19, 2008

November 24, 2009

Letter to the file:

EPA Registration Numbers

83923-1 ✓

83923-2

83923-3

83923-4

83923-5

Dani Daniel of the IRB branch contacted Ensystex IV, Inc. (Pyxis Regulatory Consulting, Inc.) representative; Michael Kellogg, advising him that the above mention csfs are deficient due to unapproved inerts and therefore, are not acceptable in accordance to the EPA guidelines. A copy of the Inert Clearance Status Form which lists all deficiencies has been sent to Mr. Kellogg with instructions to correct the alternate confidential statement of formulation and resubmit.



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 83923-1	2. EPA Product Manager V. Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ensystex IV, Inc. / Bithor SC GC	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) Ensystex IV, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of an amendment to the Confidential Statement of Formula (Basic Formulation). As no data are being submitted with this amendment, nor will data need to be reviewed to approve the proposed amendment, Ensystex believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
If "Yes" Unit Packaging wgt. No. per container		If "Yes" Package wgt No. per container		<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container 1 gallon		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Michael Kellogg	Title Agent	Telephone No. (Include Area Code) (253) 853-7369
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		8. Date Application Received (Stamped)
2. Signature 	3. Title Agent	
4. Typed Name Michael Kellogg	5. Date 10/22/09	

INERT CLEARANCE STATUS FORM

Reviewer Name: Sandra Rock			Request date: 11/02/2009
Tel: 703-308-6164	RD/IIAB	CUBE: S-7982	MAIL CODE: 7505P

A. COMMENTS:

--

B. PESTICIDE PRODUCT INFORMATION:

Receipt Number: S-861143	Date on CSF: 10/22/2009	Food-Use Pesticide: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
EPA Reg. No/File Symbol: 83923-1	Formulation: Basic	
Product Name: Bithor SC GC		

C. INGREDIENT INFORMATION:**Tolerance Exemption(s)¹****Ingredient No.1**

910 920 930 940 950 960

Chem. Name						
Trade Name: [REDACTED]						
CAS Reg. No.:						
Comments: This trade product is not sufficiently identified by the MSDS provided. Please provide full compositional information including the manufacturer, trade name, constituent names, CAS numbers, and weight/weight percent composition (100% full composition).						

Ingredient No. 2

Chem. Name:						
Trade Name:						
CAS Reg. No.:						
Comments:						

Reviewer Name: Sandra Rock

Review Date: 11/02/2009

¹Language from the Code of Federal Regulations (40 CFR 180, subpart D):

40 CFR 180.910: Inert ingredients used pre- and post-harvest; 40 CFR 180.920: Inert ingredients used pre-harvest; 40 CFR 180.930: Inert ingredients applied to animals; 40 CFR 180.940: Tolerance exemptions for active and inert ingredients for use in antimicrobial formulations; 40 CFR 180.950: Tolerance exemptions for minimal risk active and inert ingredients; and 40 CFR 180.960: Polymers.

Receipt for Section 3

S: 861143 Resubmission: ☐ Yes ☒ No

Regulatory Type: Product Registration - Section 3 Fee For Service: ☐ Yes ☒ No

Application Type: Amendment Billable: ☐ Yes ☒ No

Company: 83923 ENSYSTEX IV, INC **V**

Risk Manager: Registration Division, Risk Management Team 1

Product #: 83923-1 Product Name: BITHOR SC GC

Override#:

Me Too Section3: Me Too Product Name:

Application Date: 22-Oct-2009 **ie** OPP Rec'd Date: 26-Oct-2009 **ie**

Front End Date: 27-Oct-2009 **ie** Risk Manager Send Date: 29-Oct-2009 **ie**

FFS Due Date: Negotiated Due Date:

OPP Target Date:

Fast Track: ☐ New Ingredient: ☐

Receipt Description: CSf amendment

Form A: ☐ Signature Date: Form B: ☐ Signature Date:

New Ingredient Request Date:

New Ingredient Received Date:

Receipt Content: CSF Des:

Print Letter

Enter More Information

Tracking

View/Edit

PIN 1 Dani

Needs not approved -



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

October 29, 2009

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

JANELLE KAY
PYXIS REGULATORY CONSULTING, INC.
ENSYSTEX IV, INC
4110 136TH STREET
GIG HARBOR, WA 98332-

PRODUCT NAME: BITHOR SC GC
COMPANY NAME: ENSYSTEX IV, INC
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 83923-1
EPA RECEIPT DATE: 10/26/09

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 1, at (703) 308-8045.

Sincerely,

A handwritten signature in cursive script, appearing to read "P. L. Hanson", is positioned above the typed name.

Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

Fee for Service

^{sem} 861143Ã~

This package includes the following

☐ New Registration

☒ Amendment

☐ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: ____

for Division

☐ AD

☐ BPPD

☒ RD

Risk Mgr.

Receipt No.

S-

EPA File Symbol/Reg. No.

Pin-Punch Date:

☒ This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: \$

Parent/Child Decisions:

*Inerts not approved. See status form
J. Lee 11/2/09*

☐ Inert Cleared for Intended Use



Uncleared Inert in Product

Reviewer: *[Signature]*

Date: 10/28/09

Remarks:

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

CONTAINS CONFIDENTIAL BUSINESS INFORMATION

October 22, 2009

COURIER DELIVERY

Venus Eagle (PM 1)
Document Processing Desk (**AMEND**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Ensystex IV, Inc. – Bithor SC GC (EPA Reg. No. 83923-1)
Amendment to the Confidential Statement of Formula (CSF)

Dear Ms. Eagle,

On behalf of Ensystex IV, Inc. please find the enclosed amendment to the Bithor SC GC CSF (Basic formulation). Ensystex IV is requesting to add two (2) alternate inert ingredients and an additional source of inert ingredient as identified below:

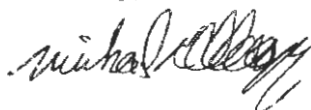
In support of this amendment, we submit the following documents:

1. Copy of the cover letter with Confidential Business Information redacted
2. Completed Application for Amendment (EPA Form 8570-1)
3. Two (2) copies of the Confidential Statement of Formula (Basic formulation dated October 22, 2009)
4. MSDS sheets for the inert ingredients listed above

The Basic formulation CSF submitted with this amendment application is intended to **REPLACE** any previously approved Basic CSF's for Bithor SC GC.

As no data are being submitted with this amendment, nor will data need to be reviewed to approve the proposed amendment, Ensystex believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee. Please feel free to call me if you have any questions or need any additional information.

Sincerely,



Michael Kellogg

Enclosures

cc: D. Nimocks; Ensystex IV, Inc.

Inert ingredient information may be entitled to confidential treatment

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

CONFIDENTIAL BUSINESS INFORMATION REDACTED

October 22, 2009

COURIER DELIVERY

Venus Eagle (PM 1)
Document Processing Desk (**AMEND**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Ensystex IV, Inc. – Bithor SC GC (EPA Reg. No. 83923-1)
Amendment to the Confidential Statement of Formula (CSF)

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Sincerely,

A handwritten signature in black ink, appearing to read "Michael Kellogg".

Michael Kellogg

Enclosures

cc: D. Nimocks; Ensystex IV, Inc.

Material to be added to an e-Jacket/Jacket

Reg. No. 83923-1

Description: _____

1. ☐ Placement within the e-Jacket/jacket:

- ☐ Default: (chronological, top = newest)
 - ☐ File Location: (PDF page number, i.e., "before page 45")
- _____
- _____

2. ☐ Send to Data Extraction contractors this material:

- ☐ Newly stamped accepted label
- ☐ Notification
- ☐ New CSF

☒ Other: Amended CSF ^{basic}

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's Name: Sam Daniel

Phone: 703 305-5409 Division: PO

Date: 09/15/09



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

SEP 15 2009

Mr. Michael Kellogg
Pyxis Regulatory Consulting, Inc.
4110 136th Street NW
Gig Harbor, WA 98332

Subject: The Addition of an Alternate Inert Source in the Basic CSF
Bithor SC GC EPA Reg. No. 83923-1
Bithor SC EPA Reg. No. 83923-2
Prothor SC 0.5 EPA Reg. No. 83923-3
Prothor SC 2 EPA Reg. No. 83923-4
Turfthor 2F EPA Reg. No. 83923-5
Your Submission dates, August 20 & 24

Dear Mr. Kellogg:

The Agency has received and reviewed your Basic Confidential Statements of Formulation dated August 20 & 24, 2009. Your request for an additional source inert, identified as [REDACTED] is granted. The new confidential statement of formulation will become a part of the permanent record. If there are questions call me at 703 305-5409.

Sincerely,

Dani Daniel
Insecticide-Rodenticide Branch
Registration Division 7505P

Inert ingredient information may be entitled to confidential treatment



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 83923-1	2. EPA Product Manager V. Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ensystex IV, Inc. / Bithor SC GC	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) Ensystex IV, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of an amendment to the Confidential Statement of Formula (Basic Formulation). As no data are being submitted with this amendment, nor will data need to be reviewed to approve the proposed amendment, Ensystex believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee.

Section - III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container 1 gallon	
5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product		6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Michael Kellogg	Title Agent	Telephone No. (Include Area Code) (253) 353-7369
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Agent	
4. Typed Name Michael Kellogg	5. Date 8/20/09	

IRB/PM1

FAST-TRACK AMENDMENTS-Completeness Screening Checklist

Experts In-Processing Signature: M. WALSH

EPA Reg. Number: <u>83923-1</u>		EPA Receipt Date: <u>8/25/09</u>		
	Check List Item	Yes	No	NA
1	Application Form (EPA Form 8570-1) -signed?	X		
2	Confidential Statement of Formula (EPA Form 8570-29) - signed?	X		
3	Certification with Respect to Citation of Data (EPA Form 8570-34) signed?			X
4	Formulator's Exemption Statement (EPA Form 8570-27) - signed?			X
5	Data Matrix (EPA Form 8570-35) [Applicable, for adding me-too uses]			
	a) Selective Method?			
	b) Cite-All Method? Applicant owns data or list only the companies offered to pay			
	c) Public copy of Matrix provided? See PR Notice 98-5			
6	Is Label Included? (5 copies)			X
Comments:				
CSF Amendment.				
Inerts approved.				

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

CONFIDENTIAL BUSINESS INFORMATION REDACTED

August 20, 2009

COURIER DELIVERY

Venus Eagle (PM 1)
Document Processing Desk (**AMEND**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Ensystex IV, Inc. – Bithor SC GC (EPA Reg. No. 83923-1)
Amendment to the Confidential Statement of Formula (CSF)

Dear Ms. Eagle,

On behalf of Ensystex IV, Inc. please find the enclosed amendment to the Bithor SC GC CSF (Basic formulation). Ensystex IV is requesting to add an additional source of inert ingredient as identified below:

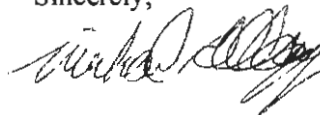
In support of this amendment, we submit the following documents:

1. Copy of the cover letter with Confidential Business Information redacted
2. Completed Application for Amendment (EPA Form 8570-1)
3. Two (2) copies of the Confidential Statement of Formula (Basic formulation dated August 20, 2009)
4. MSDS and technical specification sheet for the inert ingredient listed above

The Basic formulation CSF submitted with this amendment application is intended to **REPLACE** any previously approved Basic CSF's for Bithor SC GC.

As no data are being submitted with this amendment, nor will data need to be reviewed to approve the proposed amendment, Ensystex believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee. Please feel free to call me if you have any questions or need any additional information.

Sincerely,



Michael Kellogg

Enclosures

cc: David Nimocks; Ensystex IV, Inc.

Fee for Service

ST
perm
{856560*~

This package includes the following

- ☐ New Registration
- ☒ Amendment

- ☐ Studies? ☐ Fee Waiver?
- ☐ volpay % Reduction: ____

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr. 1

Receipt No.

S- 856560

EPA File Symbol/Reg. No.

83923-1

Pin-Punch Date:

8/25/2009

☒ This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: \$ _____

Parent/Child Decisions:

☐ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: *W. J. [Signature]*

Date: *8/26/09*

Remarks:



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

August 26, 2009

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

JANELLE KAY
PYXIS REGULATORY CONSULTING, INC.
ENSYSTEX IV, INC
4110 136TH STREET
GIG HARBOR, WA 98332-

PRODUCT NAME: BITHOR SC GC
COMPANY NAME: ENSYSTEX IV, INC
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 83923-1
EPA RECEIPT DATE: 08/25/09

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 1, at (703) 308-8045.

Sincerely,

A handwritten signature in cursive script, appearing to read "Y. K. Moore", is written above the typed name.

Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

Material to be added to an e-Jacket/Jacket

Reg. No. 83923-1

Description: _____

1. ☐ Placement within the e-Jacket/jacket:

- ☐ Default: (chronological, top = newest)
- ☐ File Location: (PDF page number, i.e., "before page 45")

2. ☐ Send to Data Extraction contractors this material:

- ☐ Newly stamped accepted label
- ☐ Notification
- ☐ New CSF *acceptance*
- ☒ Other: Letter for data requirement

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's Name: Lane Daniel

Phone: 703 305-5409 Division: RD

Date: 01/16/2009



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION PESTICIDES AND
TOXIC SUBSTANCES

JAN 16 2009

Mr. Michael Kellogg
Ensystex IV, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th Street, NW
Gig Harbor, WA 98332

Subject: Submission of Storage Stability and Corrosion Characteristics Studies
Bithor SC GC
EA Reg. No. 83923-1
Your Submission date, October 15, 2007

Dear Mr. Kellogg:

The Agency has received and reviewed the requested above mentioned studies. The studies are acceptable and your requirement for the registration of the above product is complete. Thank you for your prompt completion of the data for this section 3 registration. If there are questions call me at 703 305-5409.

Sincerely,

A handwritten signature in black ink, appearing to read "Dani", is written over a horizontal line.

Dani Daniel
Insecticide-Rodenticide Branch
Registration Division 7505P

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

CONTAINS CONFIDENTIAL BUSINESS INFORMATION

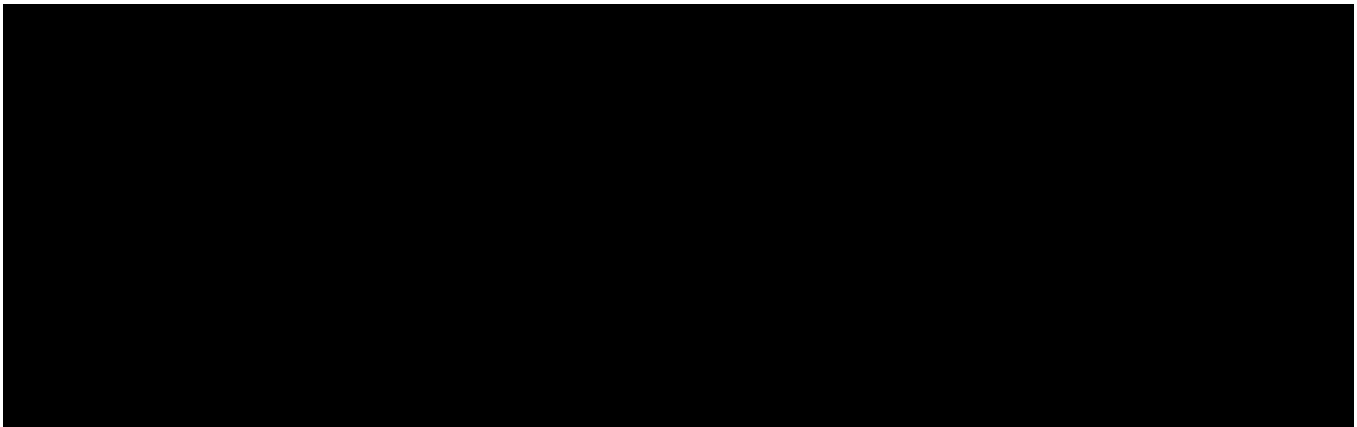
October 16, 2007

COURIER DELIVERY

Venus Eagle (PM 01)
Document Processing Desk (AMEND)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Ensystex IV, Inc. – Bithor SC GC (EPA Reg. No. 83923-1)
Request to Bridge Storage Stability and Corrosion Characteristic Study Data per the Agency
Letter dated February 12, 2007

Dear Ms. Eagle,



Claimed confidential by submitter

In support of this request, please find the enclosed:

1. Copy of cover letter with Confidential Business Information redacted
2. Completed Application for Registration (EPA Form 8570-1)

Please feel free to call me if you have any questions or need any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Kellogg", is written over a printed name.

Michael Kellogg

Enclosures

cc: David Nimocks; Ensystex IV, Inc.

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

CONFIDENTIAL BUSINESS INFORMATION REDACTED

October 16, 2007

COURIER DELIVERY

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Document Processing Desk (AMEND)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Ensystex IV, Inc. – Bithor SC GC (EPA Reg. No. 83923-1)
Request to Bridge Storage Stability and Corrosion Characteristic Study Data per the Agency
Letter dated February 12, 2007

Dear Ms. Eagle,

[REDACTED]

[REDACTED]

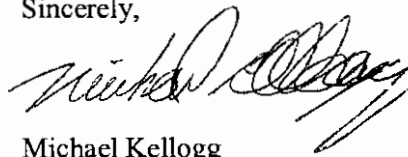
[REDACTED]

In support of this request, please find the enclosed:

1. Copy of cover letter with Confidential Business Information redacted
2. Completed Application for Registration (EPA Form 8570-1)

Please feel free to call me if you have any questions or need any additional information.

Sincerely,



Michael Kellogg

Enclosures

cc: David Nimocks; Ensystex IV, Inc.



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 83923-1	2. EPA Product Manager V. Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ensystex IV, Inc. / Bithor SC GC	PM# 01	
5. Name and Address of Applicant (Include ZIP Code) Ensystex IV, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated <u>2/12/2007</u>	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Request to bridge storage stability and corrosion characteristics study data per the Agency letter dated February 12, 2007.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
1-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
* Certification must be submitted				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Michael Kellogg		Title Agent	
		Telephone No. (Include Area Code) 253-853-7369	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Agent	
4. Typed Name Michael Kellogg		5. Date 10/16/07	



U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs
Registration Division (H7505C)
401 "M" St., S.W.
Washington, D.C. 20460

EPA Reg.
Number:

83923-1

Date of Issuance:

Term of Issuance: **Conditional**

Name of Pesticide Product:

Bithor SC GC

NOTICE OF PESTICIDE:

☒ Registration
☐ Reregistration

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

Mr. Michael Kellogg
Ensystex IV, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th Street, NW
Gig Harbor, WA 98332

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A). Once a pesticide is registered, however, it is not regarded as permanently acceptable. Registration does not eliminate the need for continual reassessment of pesticides. If the Agency determines that, at any time, additional data are required to maintain in effect an existing registration, the Agency will require submission of such data under FIFRA section (3)(c)(2)(B).

1. Revise the EPA Registration Number to read, EPA Reg. No. "83923-1".

Signature of Approving Official:

Dani Daniel
Insecticide-Rodenticide Branch
Registration Division (7505P)

Date:

FEB 12 2007

2. Make the following changes to the "Conditions of Sale and Warranty" statement:

- Under the heading entitled "**Conditions of Sales**" change the word "**should**" to "**must**". The sentence would then read "**must be followed carefully**".
- Under the heading entitled "**Disclaimer of Warranties**" Add the statement "**To the extent consistent with applicable law,**" at the beginning of the sentence stating Ensystex IV makes in warranties of merchantability...
- Under the heading beginning "**Limitations of Liability**" Add the statement "**To the extent consistent with applicable law**" at the beginning of the sentence stating "The exclusive remedy of the user or buyer"...

3. Submit two copies of your final printed labeling before you release the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sect. 6(e). Your release for shipment of the product constitute acceptance of these conditions.

4. Submit to the Agency the required one year storage stability (830.6317) study for the proposed new product under warehouse conditions. The corrosion characteristics (830.6320) study may be carried out concurrently. It is recommended that observations be made at 0, 3, 6, 9, and 12 months.

A stamped copy of the label is enclosed for your records. If you have any questions regarding this notice, please contact me at (703) 305-5409.

Enclosure:

RESTRICTED USE PESTICIDE

Toxic to Fish and Aquatic Organisms

For retail sale to and use only by certified applicators or persons under their direct supervision and only for those uses covered by the certified applicator's certification.



ACCEPTED
with COMMENTS
In EPA Letter Dated:
FEB 12 2007

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
83923-1

BITHOR SC GC

For foliar and systemic control of insect pests of
turfgrass, landscape ornamentals, shrubs and trees
on golf courses.

Active Ingredient:	By Wt.
Imidacloprid	5.0%
Bifenthrin*	2.0%
Other Ingredients:	93.0%
TOTAL:	100.0%

*Cis isomers 97% minimum, trans isomers 3% maximum

Contains 0.45 pounds of imidacloprid and 0.18 pounds of bifenthrin per gallon

EPA Reg. No. XXXXX-X EPA Est. XXXXX-XX-XXX

STOP – Read the label before use

KEEP OUT OF REACH OF CHILDREN

CAUTION

**DO NOT USE THIS PRODUCT ON GOLF COURSES
IN NASSAU COUNTY OR SUFFOLK COUNTY, NEW
YORK**

(PRECAUCION AL USUARIO: Si usted no puede leer o entender
ingles, no use este producto hasta que la etiqueta le haya sido
explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not
use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (866-367-8467)
or visit www.for-thor.com.

NET CONTENTS: As marked on container

Manufactured by:

ENSYSTEX IV, Inc.

Fayetteville, NC 28303

FIRST AID

If swallowed

- Call poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by the poison control center or doctor.
- Do not give anything to an unconscious person.

HOTLINE NUMBER

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-(800)-369-4352 for emergency medical treatment information.

NOTE TO PHYSICIAN

Note To Physician: No specific antidote is available. Treat the patient symptomatically. This product contains a pyrethroid. If large amounts have been ingested, milk, cream and other digestible fats and oils may increase absorption and so should be avoided.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove and wash contaminated clothing before reuse.

Personal Protective Equipment: Applicators and other handlers must wear long-sleeved shirt, long pants, shoes and socks. Follow manufacturer's instructions for cleaning/maintaining PPE. If there are no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations: Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Environmental Hazards

This product is extremely toxic to fish and aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate. Run-off may be hazardous to aquatic organisms in water adjacent to treated areas.

This product contains a chemical with properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirement specific to your State or Tribe, consult the agency responsible for pesticide regulation.

Do not allow children or pets on treated surfaces until the spray has dried.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food and feed. Store in original container and out of the reach of children, preferably in a locked storage area.

Handle and open container in a manner as to prevent spillage. If container is leaking, invert to prevent leakage. If container is leaking or if material is spilled for any reason or cause, carefully contain any spilled material to prevent non-target contamination. Do not walk through spilled material and dispose of as directed for pesticides below. Absorb spilled material with absorbing type compounds and dispose of as directed for pesticides below. Refer to *Precautionary Statements* on label for hazards associated with the handling of this material. In spill or leak incidents, keep unauthorized people away. You may contact Ensys IV for decontamination procedures or any other assistance that may be necessary at 1-866-367-8467 or contact Chemtrec at 1-800-424-9300.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

GENERAL INFORMATION

BITHOR SC GC controls or suppresses a wide spectrum of insects and mites on turfgrass, trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants on golf courses. (Nonbearing crops are perennial crops that will not produce a harvestable raw agricultural commodity during the season of application.) BITHOR SC GC mixes readily with water and other aqueous carriers.

BITHOR SC GC is not for use on plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes. BITHOR SC GC is not for use in commercial greenhouses, nurseries, or on grasses grown for seed, turfgrass grown for sale (sod farms) or on commercial fruit and nut trees.

Some insects can develop resistance to products used repeatedly for their control. Because the development of resistance by an insect to an insecticide cannot be predicted, the use of this product should be according to established resistance management strategies. Consult your local or state pest management authorities for details.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing and cultural practices to control different types of pests.

APPLICATION FOR TURF PESTS

BITHOR SC GC can be used for the control of a wide range of pests of turfgrass on golf courses. Because BITHOR SC GC's active ingredients have long lasting residual activity, applications for control of subsurface feeders can be made before the occurrence of egg laying activity. BITHOR SC GC's active ingredients also have sufficient knockdown and residual activity to provide curative and residual control of surface feeding pests.

Do not apply more than 4.5 pints (0.25 lb imidacloprid, 0.1 lb bifenthrin) per acre or 1.65 fluid ounces per 1000 square feet per application of product to turf. Do not apply more than 9 pints (0.5 lb of imidacloprid active ingredient, 0.2 lb bifenthrin) per acre or 3.3 fluid ounces per 1000 square feet per year of product to turf.

Application Sites

Permitted sites include turfgrass on golf courses. **New York State only: Do not apply BITHOR SC GC containing solutions to grass or turf within 100 feet of a body of water (lake, pond, river, stream, wetland or drainage ditch).**

Application Timing

The active ingredients in BITHOR SC GC have sufficiently long-lasting residual activity that applications can be made prior to egg laying by the target pest(s). Optimum control of turf pests will be achieved when application is made prior to egg hatch followed by sufficient irrigation or rainfall to move the active ingredient through the thatch and down into the underlying soil. Applications can be timed based on pest experiences at the site or in the area, current results of adult monitoring/trapping or other methods.

Post Application Watering and Mowing

Optimum control is achieved if irrigation or rainfall occurs within 24 hours after application. Uniformity of application may be adversely affected if turf is mowed prior to irrigation/rainfall occurring.

Application Precautions and Preparations

Keep children and pets off treated areas until spray has dried.

Application should not be made to turf that is frozen, waterlogged or is saturated with water. Turf in this condition will not allow the necessary vertical distribution of the active ingredient down into the soil.

BITHOR SC GC can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

Because certain cultivars may be sensitive to the final spray solution, test the effects of applications of different rates and volumes of mixed solution on a small patch of a type of grass (with observations over one week to detect the occurrence of negative effects) before application of solutions to large areas of that type of grass.

Application Equipment and Methods

Apply BITHOR SC GC mixed in water (according to the table below) as a spray of uniform, coarse droplets at a pressure low enough to eliminate drift from the target area. Properly calibrated application equipment must be used to apply BITHOR SC GC. Check calibration periodically to ensure that equipment is working properly.

Reapplication

Reapplications may be necessary particularly in the event of high pest pressure. Reapply as necessary to achieve control using higher application rates as pest pressure and foliage area increases but make reapplications no more often than once every 7 days. **New York State only: Do make a single reapplication of BITHOR SC GC if there is renewed insect activity, but not sooner than two weeks after first application.**

Turf Pest Application Use Rates

Use rates for BITHOR SC GC for turf pests are stated in fluid ounces of BITHOR SC GC per 1000 square feet and pints per acre. The application use rates listed below provide control of the listed pests under normal conditions. Apply BITHOR SC GC at 0.67 to 1.65 fluid ounces per 1000 square feet or 1.8 to 9.0 pints per acre, depending on the target pest. Recommended rates for specific pests within this range are given below. Use the higher application rates when maximum residual control is needed. However, applications of up to 1.65 fluid ounce per 1000 square feet or 4.5 pints per acre are permitted at the discretion of the applicator to control any pest. Do not apply more than 9 pints (0.5 lb of imidacloprid active ingredient, 0.2 lb bifenthrin) per acre or 3.3 fluid ounces per 1000 square feet of product per year to turf.

Turf Application Use Rates

Use Rate Table for BITHOR SC GC for Turf Applications		
Use Rate	Fluid ounces BITHOR SC GC per 1,000 square feet (Range)	Pints BITHOR SC GC per acre (Range)
A	1.32-1.65	3.6-4.5
B	1.32-1.65	3.6-4.5
B (single annual application)	2.64-3.33	7.2-9.0
C	0.9-1.65	2.3-4.5
D	0.67-1.65	1.8-4.5

1 fluid ounce = 2 tablespoons = 6 teaspoons

Do not use household utensils to measure BITHOR SC GC.

Turf Application Volumes

Apply the indicated amount of BITHOR SC GC mixed in a volume of water sufficient to adequately distribute the active ingredient to the target area(s) and to wet all foliage.

The calculated amount of BITHOR SC GC can be applied in any volume of water provided the maximum label rate is not exceeded. Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such undiluted dosing will not result in an application rate in excess of the maximum label rate.

Calculating Amounts of BITHOR SC GC to Mix for Turf Pests

To mix and apply any amount of BITHOR SC GC for turf pests based on number of square feet, determine:

A = # of Square feet of area to be treated / 1000 (for example 5,500 sq. ft. / 1000 = 5.5)

B = Applicable BITHOR SC GC Use Rate (fluid ounces per 1000 square feet) for the target pest(s) from the Use Rate Table. If treating for more than one type of pest, select the highest rate.

Calculate the amount of BITHOR SC GC to mix for turf pests as follows:

Ounces BITHOR SC GC to use = A X B

Mix this amount of BITHOR SC GC in the amount of water needed to make the application.

To mix and apply any amount of BITHOR SC GC for turf pests based on number of acres, determine:

A = # of acres of area to be treated = square feet of area to be treated / 43,560 (1 acre = 43,560 sq. ft.)

B = Applicable BITHOR SC GC Use Rate (pints per acre) for the target pest(s) from the Use Rate Table. If treating for more than one type of pest, select the highest rate.

Calculate the amount of BITHOR SC GC to mix for turf pests as follows:

Pints BITHOR SC GC to use = A X B

Mix this amount of BITHOR SC GC in the amount of water needed to make the application.

1 Pint = 16 ounces

Turf Pests Grouped by Use Rates

Use Rate A: Annual bluegrass weevil, *Aphodius* spp., Asiatic garden beetle, Black turfgrass stelenius, Black vine weevil, European chafer, European crane fly, Frit fly, Green June beetle, Japanese beetle, Northern masked chafer, Nuisance ants, Oriental beetle, *Phyllophaga* spp., Southern masked chafer, Ticks

Use Rate B and Use Rate B (single annual application): Imported Fire Ant, Mole crickets

Use Rate C: Banks grass mites, Billbugs, Chinch bugs, Centipedes, Crickets, Earwigs, Fleas, Grasshoppers, Leafhoppers, Mealybugs, Millipedes, Mites, Pillbugs, Sowbugs

Use Rate D: Armyworms, Cutworms, Sod webworms

Application Recommendations Against Specific Turf Pests

Annual Bluegrass Weevil (Hyperodes) adults: Applications should be timed to control adult weevils as they leave their overwintering sites and move into grass areas. This movement generally begins when Forsythia is in full bloom and concludes when flowering dogwood (*cornus florida*) is in full bloom. Consult your Cooperative Extension Service for more specific information regarding application timing.

Armyworms, Cutworms and Sod Webworms: To ensure optimum control, delay watering (irrigation) or mowing for 24 hours after application. The highest application rate may be necessary during periods of highest pest pressure if the grass is being maintained at a mowing height of 1 inch or greater.

Billbug adults: Applications should be made when adults first appear in the spring or when chewed or brown grass indicates damage. Degree day models have been developed to optimize application timing. Consult your Cooperative Extension Service for information specific to your region. In temperate regions, spring applications targeting billbug adults will also provide control of overwintered chinch bugs.

Chinch Bugs: Because they infest the base of grass plants, chinch bugs are often found in the thatch layer. Irrigation of the grass or high volume applications of solution can increase penetration of the solution to where the chinch bugs are located. Chinch bugs can be one of the most difficult turf pest to control. High application rates may be required to achieve effective control, particularly in the middle of the summer when both nymphs and adults are present.

Mites: To ensure optimal control of eriophyid mites, apply in combination with the labeled application rate of a surfactant. A second application, five to seven days after the first, may be necessary to achieve acceptable control.

Flea larvae: Flea larvae develop in the soil of shaded areas that are accessible to pets or other animals. Use a higher volume application when treating these areas to ensure penetration of the insecticide into the soil.

Imported Fire Ants: Combine broadcast treatments to control newly invading ants and mound treatments to eliminate existing ant colonies. If the soil is not moist, irrigate before application or use a high volume application. Broadcast treatments should be applied at 1.65 fluid oz. per 1,000 square feet. Mounds should be treated by diluting 1/3 fluid oz. (2 teaspoons) of BITHOR SC GC per gallon of water and applying 1 to 2 gallons of finished spray per mound. The mounds should be treated with sufficient force to break their apex and allow the insecticide solution to flow into the ant tunnels. A four foot diameter circle around the mound should also be treated. For best results, apply in cool weather (65 - 80°F) or in early morning or late evening hours.

Mole Cricket adults: Adult mole cricket control is difficult to attain because of continuous invasion during the early spring. Applications, made as late in the day as possible, should be watered in with 0.5 inches of water immediately following treatment. Irrigating dry soil before application will bring crickets closer to the surface.

Mole Cricket nymphs: Grass areas that received intense adult mole cricket pressure in the spring should be treated immediately prior to peak egg hatch when young nymphs are located near the soil surface. Control of larger, more damaging, nymphs later in the year may require both higher application rates and more frequent applications to maintain acceptable control. Applications, made as late in the day as possible, should be watered in with 0.5 inches of water immediately following treatment. Irrigating dry soil before application will bring crickets closer to the surface.

Ticks (including ticks that may transmit Lyme Disease and Rocky Mountain Spotted fever): Treat the entire area where exposure to ticks may occur. Avoid spot applications. Use higher spray volumes when treating areas with dense ground cover or heavy leaf litter. Ticks may be reintroduced from surrounding areas on host animals. Retreatment may be necessary to achieve and/or maintain control during periods of high pest pressure. Repeat application is necessary only if there are signs of renewed activity. Repeat application should be limited to no more than once per seven days.

Deer ticks (Ixodes sp.) have a complicated two year life cycle that involves four life stages. Applications should be made in the late fall and/or early spring to control adult ticks that are usually located on brush or grass above the soil surface and in mid to late spring to control larvae and nymphs that reside in the soil and leaf litter.

American dog ticks commonly congregate along paths or roadways where humans are likely to be encountered. Applications should be made as necessary from mid-spring to early fall to control their larvae, nymphs and adults.

FOLIAR AND BROADCAST APPLICATION FOR ORNAMENTAL PESTS

BITHOR SC GC, applied to foliage and broadcast on the soil, controls or suppresses a wide range of pests on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants in golf course landscapes. (Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months.) BITHOR SC GC is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

BITHOR SC GC is a systemic insecticide meaning it can be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of BITHOR SC GC is realized when BITHOR SC GC is applied on or near a growing portion of the plant from which it may be translocated to other parts of the plant. Combining BITHOR SC GC with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant. Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. For this reason, applications should be made prior to anticipated pest infestation to achieve optimum levels of control. Foliar applications of BITHOR SC GC also have local systemic activity against insect pests.

For outdoor ornamentals, broadcast applications cannot exceed a total of 9.0 pints (0.5 lb of imidacloprid and 0.2 lb of bifenthrin) per acre per year.

Application Sites

For use on ornamental plants including but not limited to trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants in golf course landscapes.

Application Preparation

BITHOR SC GC can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

Foliar Application

Ornamental Application to Control Ants

BITHOR SC GC can be used to indirectly control ants when applied to control aphids, scale insects, mealybugs and other sucking insects on ornamentals thereby limiting the amount of honeydew available.

Foliar Application Volumes and Application Methods

BITHOR SC GC mixes readily with water and may be used in many types of application equipment. Mix required amount of product (from the table below) with the amount of water required to uniformly wet foliage and apply as desired dependent upon the selected use pattern. When making foliar applications on hard to wet foliage such as holly, pine, or ivy, the addition of a spreader/sticker is recommended. If concentrate or mist type spray equipment is used, an equivalent amount of product should be used on the area sprayed, as would be used in a dilute application. Begin treatments prior to establishment of high pest populations. Reapply as needed.

Foliar Application Use Rates

Use rates for BITHOR SC GC for foliar application for ornamental pests are stated in fluid ounces (and milliliters) of BITHOR SC GC per 100 gallons of water. The application rates listed below provide control of the listed pests under normal conditions.

Fluid ounces BITHOR SC GC per 100 gallons of water	Milliliters BITHOR SC GC per 100 gallons of water
6.7	202

1 fluid ounce = 2 tablespoons = 6 teaspoons

Do not use household utensils to measure BITHOR SC GC.

Ornamental Pests Controlled by Foliar Application

Adelgids, Aphids, Japanese beetles, Lacebugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Mealybugs, Psyllids, Sawfly larvae, Thrips (suppression), Whiteflies

Broadcast Application

Broadcast Application Volumes and Application Method

Mix required amount of product in a quantity of water sufficient to uniformly treat area. Use a minimum of 2 gallons of water per 1000 square feet. To achieve optimum control, irrigate treated area in order to incorporate treatment into upper level of soil.

Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

For outdoor ornamentals, broadcast applications cannot exceed a total of 9.0 pints (0.5 lb of imidacloprid and 0.2 lb of bifenthrin) per acre or 3.3 fluid ounces per 1000 square feet per year.

Broadcast Application Use Rates

Use rates for BITHOR SC GC for broadcast application for ornamental pests are stated in fluid ounces (and milliliters) of BITHOR SC GC per 1000 square feet. The application rates listed below provide control of the listed pests under normal conditions. Apply BITHOR SC GC at 0.67 to 1.65 fluid ounces per 1000 square feet, depending on the target pest. Recommended rates for specific pests within this range are given below. Use the higher application rates when maximum residual control is needed. However, applications of up to 1.65 fluid ounces per 1000 square feet are permitted at the discretion of the applicator to control any pest.

Use Rate Table for BITHOR SC GC for Broadcast Applications		
Use Rate	Fluid ounces BITHOR SC GC per 1000 square feet	Milliliters BITHOR SC GC per 1000 square feet
A	1.32-1.65	40-50
B	0.9-1.65	27-50
C	0.67-1.65	20.3-50

Ornamental Pests Controlled by Broadcast Application

Use Rate A: Annual bluegrass weevil, *Aphodius* spp., Asiatic garden beetle, Black turfgrass atenioid, Black vine weevil, European chafer, Green June beetle, Japanese beetle, Northern masked chafer, Oriental beetle, *Phyllophaga* spp., Southern masked chafer, Ticks

Use Rate B: Beetle adults (incl. Diaprepes, flea beetles, Japanese beetle and weevils), Billbugs, Chinch bugs, Centipedes, Crickets, Earwigs, Firebrats, Fleas, Fungus gnats, Grasshoppers, Leafhoppers, Mealybugs, Millipedes, Mites, Nuisance ants, Pillbugs, Scorpions, Sowbugs, Spiders, Springtails, Thrips

Use Rate C: Armyworms, Budworms, Cutworms, Leafrollers, Sod webworms

SOIL INJECTION AND SOIL DRENCH FOR ORNAMENTAL PESTS

BITHOR SC GC, applied as a soil drench or soil injection, controls or suppresses a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants and ground covers on golf courses. (Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months.) BITHOR SC GC is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

BITHOR SC GC is a systemic insecticide meaning it can be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of BITHOR SC GC is realized when BITHOR SC GC is applied on or near a growing portion of the plant from which it may be translocated to other parts of the plant. Combining BITHOR SC GC with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant. Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. For this reason, applications should be made prior to anticipated pest infestation to achieve optimum levels of control.

Applications to trees for the control of existing borer infestations may not prevent the eventual loss of the tree due to existing damage already caused by the pest and stress to the tree caused by the pest infestation.

Application Sites

For use on ornamental plants including but not limited to trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants on golf courses.

Application Preparation

BITHOR SC GC can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

Ornamental Pests Controlled by Soil Injection or Drench Application

Adelgids, Aphids, Armored scales (suppression), Black vine weevil larvae, Eucalyptus longhorned borer, Flatheaded borers (including bronze birch borer and alder borer), Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Leaf miners, Mealybugs, Pine tip moth larvae, Psyllids, Royal palm bugs, Sawfly larvae, Soft scales, Thrips (suppression), White grub larvae, Whiteflies

Soil Injection for Trees

Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Trees

Use Rate Table for BITHOR SC GC for Soil Injection for Trees
0.45 to 0.9 fluid ounces per inch of trunk diameter (D. B. H.) / 14 to 27 milliliters per inch of trunk diameter (D. B. H.)

Soil Injection Volumes and Application Method for Trees

Mix the calculated amount of BITHOR SC GC in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure according to one of the two following methods. Make a minimum of 4 injection holes per tree. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Grid Injection: Evenly space holes on 2.5 foot centers in a grid pattern in the soil beneath the tree's branches/foliage out to the tree's drip line.

Basal Injection: Evenly space injection holes around the base of the tree no more than 12 inches out from the tree.

Soil Drench for Trees

Soil Drench Use Rate for Trees

Use Rate Table for BITHOR SC GC for Soil Drench for Trees
0.45 to 0.9 fluid ounces per inch of trunk diameter (D. B. H.) / 14 to 27 milliliters per inch of trunk diameter (D. B. H.)

Soil Drench Volume and Application Method for Trees

Mix the calculated amount of BITHOR SC GC in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the tree directed to the root zone. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

Soil Injection for Shrubs

Soil injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Shrubs

Use Rate Table for BITHOR SC GC for Soil Injection for Shrubs
0.45 to 0.9 fluid ounces per foot of shrub height
14 to 27 milliliters per foot of shrub height

Soil Injection Volume and Application Method for Shrubs

Mix the calculated amount of BITHOR SC GC in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply to individual plants using dosage indicated at a low pressure, making a minimum of 4 injection holes per shrub. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Soil Drench for Shrubs

Soil Drench Use Rate for Shrubs

Use Rate Table for BITHOR SC GC for Soil Drench for Shrubs
0.45 to 0.9 fluid ounces per foot of shrub height
14 to 27 milliliters per foot of shrub height

Soil Drench Volumes and Application Method for Shrubs

Mix the calculated amount of BITHOR SC GC in the amount of water determined to be adequate for the solution to be adequately dispersed, but at a rate no less than 10 gallons per 1000 square feet around the base of each shrub directed to the root zone. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier

Soil Incorporation for Flowers and Groundcovers

Apply as a broadcast treatment and incorporate into the soil before planting or apply after plants are established. If application is made to established plants, optimum control will be gained if area is irrigated thoroughly after application.

Soil Incorporation Use Rate for Flowers and Groundcovers

Use Rate Table for BITHOR SC GC for Soil Incorporation Groundcovers	for Flowers and Groundcovers
1.32 to 1.65 fluid ounces per 1000 square feet	
40 to 50 milliliters per 1000 square feet	

ATTENTION

Do not graze treated areas or use clippings from treated areas for feed or forage.

Avoid runoff or puddling of irrigation water following application.

Do not apply by air.

Do not apply by any type of irrigation system.

IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded. By using this product, user or buyer accepts the following conditions, disclaimer of warranties and limitations of liability.

CONDITIONS OF SALE: The Directions for Use of this product are believed to be adequate and should be followed carefully. However, because of manner of use and other factors beyond the control of Ensystex IV, Inc., it is impossible for Ensystex IV to eliminate all risks associated with the use of this product such as ineffectiveness or unintended consequences. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Ensystex IV harmless for any claims relating to such factors.

DISCLAIMER OF WARRANTIES: Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the Directions for Use under normal conditions of use. ENSYSTEX IV MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. Any warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, under abnormal conditions or under conditions not reasonably foreseeable by (or beyond the control of) seller or Ensystex IV, Inc., and buyer assumes the risk of any such use. No agent of Ensystex IV, Inc. is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein.

LIMITATIONS OF LIABILITY: To the extent permitted by law, Ensystex IV shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ENSYSTEX IV AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ENSYSTEX IV, THE REPLACEMENT OF THE PRODUCT.

This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

BITHOR is a registered trademark of Ensystex IV, Inc.

Revised 10/06



United States
Environmental Protection Agency
Washington, DC 20480

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number To be assigned 83923-R	2. EPA Product Manager V. Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ensystex IV, Inc. / Bithor SC GC	PM# 01	
5. Name and Address of Applicant (Include ZIP Code) Ensystex IV, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 432-1421 Product Name Allectus GC SC Insecticide	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input checked="" type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This application falls under Category R30 (85: New product - Me-Too, Fast Track) as only product chemistry data are being submitted/bridged and the cite-all option under the selective method is being used to support product specific acute toxicity and efficacy data requirements. In addition, the technical source(s) of active ingredient(s) are based on registered source(s) of supply. The fee due is \$1050 and the decision timeline is 3 months. Please email or fax the fee for service invoice to: fees@PyxisRC.com or 253-853-5516.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container 1 gallon		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Michael Kellogg	Title Agent	Telephone No. (include Area Code) (253) 853-7369	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 	3. Title Agent		
4. Typed Name Michael Kellogg	5. Date 10/26/06		

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

CONFIDENTIAL BUSINESS INFORMATION REDACTED

October 26, 2006

COURIER DELIVERY

Venus Eagle (PM 01)
Document Processing Desk (REGFEE)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Ensystex IV, Inc. – Bithor SC GC (EPA Reg. No. - To be assigned)
Application for New Pesticide Registration

Dear Ms. Eagle,

On behalf of Ensystex IV, Inc. we are submitting an application for registration of Bithor SC GC, an end-use product containing imidacloprid and bifenthrin as the active ingredients. In support of this application, we submit the following documents:

1. Copy of cover letter with Confidential Business Information Redacted
2. Application for Registration (EPA Form 8570-1)
3. Confidential Statement of Formula
4. Formulators Exemption Statement (EPA Form 8570-27)
5. Five (5) copies of the proposed labeling
6. Certification with Respect to Citation of Data (EPA Form 8570-34)
7. Agency Internal Use Copy of the Data Matrix (EPA Form 8570-35)
8. Public File Copy of the Data Matrix (EPA Form 8570-35)
9. Letter of Authorization
10. Product Specific Data:

Volume 1	830.1550, 830.1600, 830.1650, 830.1670, 830.1750, 830.1800	Kellogg, M. Product Identity and Composition, Description of the Materials Used, Description of the Formulation Process, Discussion of the Formation of Impurities, Certified Limits, and Analytical Methods to Verify Certified Limits for Bithor SC GC.
Volume 2	830.6303, 830.6314, 830.6317, 830.6320 830.7000, 830.7100, 830.7300	Kellogg, M. Request to Bridge Physical/Chemical Characteristics Data to Support the Registration of Bithor SC GC.
Volume 3	830.6302, 830.6304, 830.6313, 830.6315, 830.6316, 830.6319, 830.6321, 830.7050, 830.7200, 830.7220, 830.7370, 830.7550- 830.7570, 830.7840- 830.7860, 830.7950	Kellogg, M. Waiver Request for Certain Data Requirements for Bithor SC GC.

[REDACTED]

Ensystex IV, Inc. believes its product, Bithor SC GC, is substantially similar to a currently registered product (EPA Reg. No. 432-1421). Ensystex IV, Inc. believes this application falls under Category R30 (85: New product – Me-Too, Fast Track) as only product chemistry data are being submitted/bridged to support the application for registration and the cite-all option under the selective method is being used to support product specific acute toxicity and efficacy data requirements. In addition, the technical source(s) of active ingredient(s) are based on a registered source(s) of supply and therefore, Bithor SC GC qualifies for Formulators Exemption for imidacloprid and bifenthrin generic data requirements.

We trust you will find this application complete and in compliance with the requirements for registration under FIFRA. Please feel free to call me if you have any questions or need any additional information.

Sincerely,



Michael Kellogg

Enclosures

cc: David Nimocks; Ensystex IV, Inc.

ENSYSTEX III, Inc.

2709 Breezewood Ave., P. O. Box 2587, Fayetteville, NC 28302-2587 USA
Telephone - 1-910-484-6163 x 203 Fax - 1-910-484-3378 Email david@ensystex.com

November 2, 2005

To Whom It May Concern:

Re: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as agent for Ensytex III, Inc. (EPA Company Number pending), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

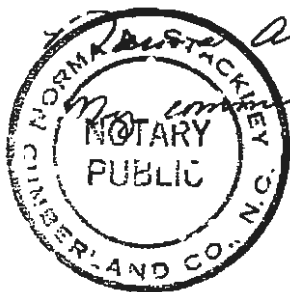
Sincerely,



David Nimocks
Chairman

cc: Pyxis Regulatory Consulting, Inc.

Notary





United States
Environmental Protection Agency
Washington, DC 20460
Formulator's Exemption Statement
(40 CFR 152.85)

Applicant's Name and Address Ensystex IV, Inc. 2709 Breezewood Avenue Fayetteville, NC 28303	EPA File Symbol/Registration Number To be assigned
	Product Name Bithor SC GC
	Date of Confidential Statement of Formula (EPA Form 8570-4) 10/23/2006

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Imidacloprid
Bifenthrin

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).

(3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement.

That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source		
Active Ingredient	Product Name	Registration Number
Imidacloprid		
Bifenthrin		
Signature	Name and Title	Date
	Michael Kellogg / Agent	10/26/06

EPA Form 8570-27 (Rev. 06-2004)

Copy 1 - EPA
Copy 2 - Applicant copy

Product ingredient source information may be entitled to confidential treatment


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
**401 M Street, S.W.
WASHINGTON, D.C. 20460**

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Ensystex IV, Inc.; 2709 Breezewood Ave.; Fayetteville, NC 28302; (800) 753-2847	EPA Registration Number/File Symbol To be assigned 83923-1
Active Ingredient(s) and/or representative test compound(s) Imidacloprid, Bifenthrin	Date October 26, 2006
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial Nonfood	Product Name Bithor SC GC

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.


Signature 	Date 10/26/06	Typed or Printed Name and Title Michael Kellogg; Agent
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DATA MATRIX

Date October 26, 2006			EPA Reg No./File Symbol To be assigned		Page 1 of 10
Applicant's/Registrant's Name & Address Ensystem IV, Inc. 2709 Breezewood Avenue Fayetteville, NC 28303			Product Bithor SC GC		
Ingredient Imidacloprid, Bifenthrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Product Specific Data Requirements – Product Chemistry					
830.1550	Product Identity and Composition	Volume 1	Ensystem IV, Inc.	OWN	
830.1600	Description of Materials Used to Produce the Product	Volume 1	Ensystem IV, Inc.	OWN	
830.1620	Description of Production Process				Not required ¹
830.1650	Description of Formulation Process	Volume 1	Ensystem IV, Inc.	OWN	
830.1670	Discussion of Formation of Impurities	Volume 1	Ensystem IV, Inc.	OWN	
830.1700	Preliminary Analysis				Not required ²
830.1750	Certified Limits	Volume 1	Ensystem IV, Inc.	OWN	
830.1800	Enforcement Analytical Method	Volume 1	Ensystem IV, Inc.	OWN	
830.6302	Color				Not required ³
830.6303	Physical State		Ensystem IV, Inc.	OWN	See endnote ⁴
830.6304	Odor				Not required ³
830.6313	Stability to Normal and Elevated Temperatures, Metals, and Metal Ions				Not required ³
830.6314	Oxidation/Reduction: Chemical Incompatibility		Ensystem IV, Inc.	OWN	See endnote ⁴
830.6315	Flammability				Not required ⁵
830.6316	Explosibility				Not required ⁶
Signature 			Name and Title Michael Kellogg, Consultant		Date 10/26/06


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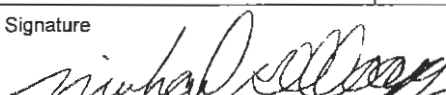
DATA MATRIX

Date <u>October 26, 2006</u>			EPA Reg No./File Symbol <u>To be assigned</u>		Page <u>2</u> of 10
Applicant's/Registrant's Name & Address Ensystem IV, Inc. 2709 Breezewood Avenue Fayetteville, NC 28303			Product Bithor SC GC		
Ingredient <u>Imidacloprid, Bifenthrin</u>					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6317	Storage Stability				PRN 92-5 ⁷
830.6319	Miscibility				Not required ⁸
830.6320	Corrosion Characteristics				See endnote ⁷
830.6321	Dielectric Breakdown Voltage				Not required ⁹
830.7000	pH		Ensystem IV, Inc.	OWN	See endnote ⁴
830.7050	UV/Visible Absorption				Not required ³
830.7100	Viscosity		Ensystem IV, Inc.	OWN	See endnote ⁴
830.7200	Melting Point/Melting Range				Not required ³
830.7220	Boiling Point/Boiling Range				Not required ³
830.7300	Density/Relative Density/Bulk Density		Ensystem IV, Inc.	OWN	See endnote ⁴
830.7370	Dissociation Constants in Water				Not required ³
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method				Not required ³
830.7560	Partition Coefficient (n-octanol/water), Generator Column Method				Not required ³
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography				Not required ³
Signature 			Name and Title Michael Kellogg, Consultant		Date <u>10/26/06</u>

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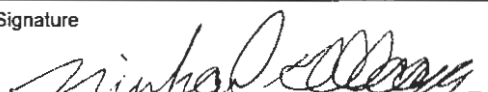
DATA MATRIX

Date October 26, 2006			EPA Reg No./File Symbol To be assigned		Page 3 of 10
Applicant's/Registrant's Name & Address Ensystem IV, Inc. 2709 Breezewood Avenue Fayetteville, NC 28303			Product Bithor SC GC		
Ingredient Imidacloprid, Bifenthrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7840	Water Solubility: Column Elution Method; Shake Flask Method				Not required ³
830.7860	Water Solubility, Generator Column Method				Not required ³
830.7950	Vapor Pressure				Not required ³
Product Specific Data Requirements – Acute Toxicity					
870.1100	Acute Oral Toxicity: Rat	Cite-All		PAY	
870.1200	Acute Dermal Toxicity: Rat	Cite-All		PAY	
870.1300	Acute Inhalation Toxicity: Rat	Cite-All		PAY	
870.2400	Primary Eye Irritation: Rabbit	Cite-All		PAY	
870.2500	Primary Dermal Irritation	Cite-All		PAY	
870.2600	Dermal Sensitization	Cite-All		PAY	
Product Specific Data Requirements - Efficacy					
810.3100	Soil Treatments for Imported Fire Ants	Cite-All		PAY	
Signature 			Name and Title Michael Kellogg, Consultant		Date 10/26/06

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DATA MATRIX


Date October 26, 2006		EPA Reg No./File Symbol To be assigned		Page 4 of 10	
Applicant's/Registrant's Name & Address Ensystex IV, Inc. 2709 Breezewood Avenue Fayetteville, NC 28303		Product Bithor SC GC			
Ingredient Imidacloprid, Bifenthrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Bithor SC GC Product Specific Acute Toxicity and Efficacy Data Requirements					
Ensystex IV, Inc. is using the cite-all option under the selective method to satisfy acute toxicity and efficacy data requirements. Ensystex IV, Inc. will make offers-to-pay to the following companies on the data submitters list of September 30, 2006.					
Imidacloprid Product Specific Data Requirements					
Imidacloprid Product Specific Data Requirements	Cite-All		Syngenta Crop Protection, Inc.	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Nufarm Americas Inc.	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Bayer CropScience LP	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Bayer Environmental Science	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Bayer Corporation	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Gustafson LLC	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Chemical Specialties Inc.	PAY	
Signature 			Name and Title Michael Kellogg, Consultant		Date 10/26/06

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DATA MATRIX


Date October 26, 2006			EPA Reg No./File Symbol To be assigned		Page 5 of 10
Applicant's/Registrant's Name & Address Ensystem IV, Inc. 2709 Breezewood Avenue Fayetteville, NC 28303			Product Bithor SC GC		
Ingredient Imidacloprid, Bifenthrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Imidacloprid Product Specific Data Requirements	Cite-All		Bayer Healthcare LLC	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Mitsui Chemicals America, Inc.	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Lanxess Corporation	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Albaugh, Inc.	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Spray Drift Task Force	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Dow AgroSciences LLC	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Arbor Systems, LLC	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Pet Logic, LLC	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Nufarm, Inc.	PAY	
Signature 			Name and Title Michael Kellogg, Consultant		Date 10/26/06

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DATA MATRIX


Date October 26, 2006			EPA Reg No./File Symbol To be assigned		Page 6 of 10
Applicant's/Registrant's Name & Address Ensystem IV, Inc. 2709 Breezewood Avenue Fayetteville, NC 28303			Product Bithor SC GC		
Ingredient Imidacloprid, Bifenthrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Imidacloprid Product Specific Data Requirements	Cite-All		Outdoor Residential Exposure Task Force	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Agricultural Reentry Task Force	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Bayer Advanced	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Zelam Ltd.	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Arborjet	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Residential Exposure Joint Venture (REJV)	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Agricultural Handlers Exposure Task Force	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Arch Treatment Technologies, Inc.	PAY	
Imidacloprid Product Specific Data Requirements	Cite-All		Etigra, LLC	PAY	
Signature 			Name and Title Michael Kellogg, Consultant		Date 10/26/06

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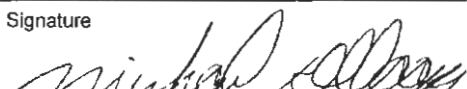
Date October 26, 2006			EPA Reg No./File Symbol To be assigned		Page 7 of 10
Applicant's/Registrant's Name & Address Ensystem IV, Inc. 2709 Breezewood Avenue Fayetteville, NC 28303			Product Bithor SC GC		
Ingredient Imidacloprid, Bifenthrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Imidacloprid Product Specific Data Requirements	Cite-All		Interregional Research Project No. 4	PAY	
Bifenthrin Product Specific Data Requirements					
Bifenthrin Product Specific Data Requirements	Cite-All		Nufarm Americas Inc.	PAY	
Bifenthrin Product Specific Data Requirements	Cite-All		The Ortho Business Group	PAY	
Bifenthrin Product Specific Data Requirements	Cite-All		FMC Corp.	PAY	
Bifenthrin Product Specific Data Requirements	Cite-All		Bayer Environmental Science	PAY	
Bifenthrin Product Specific Data Requirements	Cite-All		The Scotts Company	PAY	
Bifenthrin Product Specific Data Requirements	Cite-All		McLaughlin Gormley King Co.	PAY	
Bifenthrin Product Specific Data Requirements	Cite-All		Amvac Chemical Corp.	PAY	
Signature 			Name and Title Michael Kellogg, Consultant		Date 10/26/06

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Applicant's/Registrant's Name & Address Ensystem IV, Inc. 2709 Breezewood Avenue Fayetteville, NC 28303			Product Bithor SC GC		
Ingredient Imidacloprid, Bifenthrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Bifenthrin Product Specific Data Requirements	Cite-All		Southern States Cooperative, Inc.	PAY	
Bifenthrin Product Specific Data Requirements	Cite-All		Nippon Soda Co. Ltd.	PAY	
Bifenthrin Product Specific Data Requirements	Cite-All		The Andersons Lawn Fertilizer Division, Inc.	PAY	
Bifenthrin Product Specific Data Requirements	Cite-All		Sunniland Corp.	PAY	
Bifenthrin Product Specific Data Requirements	Cite-All		Lesco Inc.	PAY	
Bifenthrin Product Specific Data Requirements	Cite-All		Makhteshim Chemical Works Ltd.	PAY	
Bifenthrin Product Specific Data Requirements	Cite-All		Howard Fertilizer & Chemical	PAY	
Bifenthrin Product Specific Data Requirements	Cite-All		BASF Sparks LLC	PAY	
Bifenthrin Product Specific Data Requirements	Cite-All		Control Solutions, Inc.	PAY	
Signature 			Name and Title Michael Kellogg, Consultant		Date 10/26/06

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Ingredient Imidacloprid, Bifenthrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Bifenthrin Product Specific Data Requirements	Cite-All		Arizona Chemical Group Inc.	PAY	
Bifenthrin Product Specific Data Requirements	Cite-All		Makhteshim-Agan of North America Inc.	PAY	
Bifenthrin Product Specific Data Requirements	Cite-All		Spray Drift Task Force	PAY	
Bifenthrin Product Specific Data Requirements	Cite-All		Bengal Products Inc.	PAY	
Bifenthrin Product Specific Data Requirements	Cite-All		United Phosphorus Inc.	PAY	
Bifenthrin Product Specific Data Requirements	Cite-All		Outdoor Residential Exposure Task Force, LLC	PAY	
Bifenthrin Product Specific Data Requirements	Cite-All		Agricultural Reentry Task Force	PAY	
Bifenthrin Product Specific Data Requirements	Cite-All		Non-Dietary Exposure Task Force (NDETF)	PAY	
Bifenthrin Product Specific Data Requirements	Cite-All		Residential Exposure Joint Venture (REJV)	PAY	
Signature 			Name and Title Michael Kellogg, Consultant		Date 10/26/06

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Ingredient Imidacloprid, Bifenthrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Bifenthrin Product Specific Data Requirements	Cite-All		Atex, Inc.	PAY	
Bifenthrin Product Specific Data Requirements	Cite-All		Agricultural Handlers Exposure Task Force	PAY	
Imidacloprid and Bifenthrin Generic Data Requirements					
Ensystem IV, Inc. qualifies for Formulator's Exemption for imidacloprid and bifenthrin generic data requirements.					
Signature 			Name and Title Michael Kellogg, Consultant		Date 10/26/06

Endnotes for Data Matrix for Bithor SC GC

-
- ¹ **830.1620** - Per OPPTS 830.1000, these data are not required for the registration of an end-use product. See 830.1650 for formulation process information.
- ² **830.1700** - This product does not consist solely of the technical grade active ingredient (TGAi) and is not produced by an integrated system, therefore, per OPPTS 830.1700, these data are not required.
- ³ **830.6302, 830.6304, 830.6313, 830.7050, 830.7200, 830.7220, 830.7370, 830.7550, 830.7560, 830.7570, 830.7840, 830.7860 and 830.7950** - Per OPPTS 830.1000, these data are not required for the registration of an end-use product.
- ⁴ **830.6303, 830.6314, 830.7000, 830.7100 and 830.7300** - Ensystex IV, Inc. requests that data submitted to support the registration of their Bithor SC product (EPA File Symbol No. Pending) be used to support this registration, Bithor SC GC. Please refer to Volume 2 (MRID No. Pending) of the Bithor SC application for registration submission dated October 26, 2006.
- ⁵ **830.6315** - This product is not a combustible liquid; therefore these data are not applicable to this end-use product. Please refer to the Confidential Statement of Formula for additional information on the composition of Bithor SC GC.
- ⁶ **830.6316** - This product does not have explosive characteristics; therefore these data are not required. Please refer to the Confidential Statement of Formula for additional information on the composition of Bithor SC GC.
- ⁷ **830.6317, 830.6320** - Ensystex IV, Inc. is currently conducting storage stability and corrosion characteristic studies to satisfy guidelines 830.6317 and 830.6320, respectively for their Bithor SC product. Ensystex IV, Inc. requests that data being generated to support the registration of their Bithor SC product be used to support this registration, Bithor SC GC. Per PR Notice 92-5, storage stability data are not required to be submitted unless specifically requested by the Agency. OPPTS 830.6317 and 830.6320 guidelines allow the corrosion characteristics study and storage stability study to be conducted simultaneously. Ensystex IV, Inc. will submit these data upon completion. As these studies take over a year to complete, Ensystex IV, Inc. requests that a conditional registration for Bithor SC GC be granted on the submission of these data.
- ⁸ **830.6319** - Bithor SC GC is a suspension concentrate formulation and not an emulsifiable concentrate. In addition, the proposed label recommends dilution of Bithor SC GC with water, not oil; therefore, these data are not applicable nor are these data required.
- ⁹ **830.6321** - This product is not proposed for use around electrical equipment. Therefore, these data are not applicable nor are these required.

